

LORETTO TELEPHONE COMPANY, INC.

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**GENERAL SUBSCRIBER SERVICE TARIFF**

**PART III**

LORETTO TELEPHONE  
COMPANY, INC  
TENNESSEE

ORIGINAL SHEET 2

ISSUED June 15, 1998

EFFECTIVE August 1, 1998

BY PRESIDENT \_\_\_\_\_

**APPLICATION AND EXPLANATION OF SYMBOLS**

A Application

These Tariffs apply to the Local Telephone Exchange Services of the Loretto Telephone Company, Inc , hereinafter referred to as the Telephone Company in its exchanges as follows

Exchanges	County
Loretto, Tennessee	Lawrence
Leoma, Tennessee	Lawrence
St Joseph, Tennessee	Lawrence
Ethridge, Tennessee	Lawrence
Five Points, Tennessee	Lawrence

The provision of service is also subject to the rates, charges, Rules and Regulations in Part I, II, and IV of these Tariffs of the Telephone Company which parts as they now exist or as they be revised, added to, or supplemented by superseding issues are hereby made a part of these Local Exchange Service Tariffs

These Tariffs cancel and supersede all other Tariffs of the Telephone Company issued and effective prior to the effective date of these Tariffs

**GENERAL SUBSCRIBER SERVICE TARIFF**

**PART III**

LORETTO TELEPHONE  
COMPANY, INC  
TENNESSEE

4<sup>th</sup> Revised Sheet 3

ISSUED June 15, 1998

EFFECTIVE August 1, 1998

BY PRESIDENT \_\_\_\_\_

**ETHRIDGE, FIVE POINTS, LEOMA, LORETTO, ST. JOSEPH EXCHANGES**

1 General

A The rates quoted in this tariff are subject to orders entered in applicable cases by the Tennessee Public Service Commission and in case of conflict the rates specifically approved by the commission shall cover Unless otherwise specified, these rates are for periods of one month and are payable monthly in advance They entitle the customer to exchange telephone service within the Ethridge, Five Points, Leoma, Loretto, and St Joseph exchanges

B The rates quoted herein also entitle the subscribers of Loretto Telephone Company, Inc to call without additional charge any of the exchanges of Loretto Telephone Company, Inc and the exchanges of Lawrenceburg and Summertown, Tennessee of BellSouth Telecommunications, Inc (T)

<u>Class of Service</u>	<u>Service Rate</u>	
Business 1 Party	\$29 95	
Property Tax Relief Bill	( 0 00)	(I)
Tariff Rate of Basic Business 1 Party	\$29 95	(I)
Residence 1 Party	13 35	
Paystation Access Line	See Part II SHEET 46	(T)

No Extra Line Mileage or Zone Charges apply in these Exchanges

ANNEX 1

INTRALATA SWITCHED TOLL SERVICES ANNEX

Effective: January 1, 1985

This Annex between SOUTH CENTRAL BELL TELEPHONE COMPANY, having its principal place of business in Birmingham, Alabama, herein called the Bell Company, and the Independent Company as identified in the Agreement for the Provision of Telecommunications Services and Facilities, sets forth the terms and conditions regarding the provision of intraLATA switched toll services.

SECTION I

TRAFFIC COVERED BY THIS ANNEX

IntraLATA Switched Toll Services are defined as IntraLATA Message Telecommunications Services (MTS), including optional calling plans, Outward Wide Area Telecommunications Services (WATS) and 800 Service, which are furnished within LATAs in which both the Bell Company and the Independent Company operate in whole or in part by the system of the Independent Company and by the system of the Bell Company and are furnished exclusively by exchange carriers under uniform toll tariffs.

When Independent-to-Independent (I-I) or Bell-to-Independent (B-I) traffic ceases to be furnished under toll rate schedules identical for both the Independent Company and the Bell Company or when either I-I or B-I traffic becomes an Extended Area Service (EAS) or other local service offering, such traffic will no longer be covered by this Annex. No compensation to the Independent Company will be made by the Bell Company for such traffic under this Annex.

## SECTION II

### DEFINITIONS

For purposes of this Annex:

The System of the Independent Company comprises the exchange areas, exchanges, toll stations and toll circuit groups operated by the Independent Company and associated with LATAs in which the Bell Company operates including systems of local wireline exchange carriers associated within the same LATA other than the Bell Company with which the Independent Company connects, as specified in Exhibit A of this Annex.

The System of the Bell Operating Company comprises the exchange areas, exchanges, toll stations and toll circuit groups operated by the Bell Company, and will include systems of local wireline exchange carriers within the same LATA other than those identified as a part of the system of the Independent Company, as specified in Exhibit A.

IntraLATA Message Telecommunications Services (MTS) includes the facilities used and services rendered in furnishing telephone toll service communications between customer premises in different exchange areas within a LATA, in accordance with the schedules of charges, regulations and conditions stated in the uniform statewide intraLATA exchange carrier toll tariff(s).

IntraLATA Outward Wide Area Telecommunications Service (WATS) includes facilities used and service rendered in furnishing telephone toll service communications from an access line to other stations within a specified area in a LATA in accordance with the schedules of charges, regulations and conditions stated in the exchange carrier toll tariff(s).

IntraLATA 800 Service includes the facilities used and services rendered in furnishing 800 Service from stations within a LATA to a customer premises in accordance with the schedules of charges, regulations and conditions stated in the exchange carrier toll tariff(s).

### SECTION III INDEPENDENT COMPANY EXCHANGES

The exchanges of the Independent Company system covered by this Annex are listed in Exhibit A attached hereto.

### SECTION IV PHYSICAL CONNECTION

The Bell Company and the Independent Company will connect and maintain the connections of their respective systems at the point or points listed in Exhibit A during the term of this Annex. Neither party will, without the written consent of the other, connect the facilities of the other party with any facilities other than as indicated in Exhibit A.

### SECTION V ROUTING OF TRAFFIC

The traffic interchanged under this Annex will be routed as indicated in Exhibit A to this Annex. Changes in routing must be agreed to in writing by the parties before becoming effective.

## SECTION VI

### TRAFFIC RECORDING AND OPERATOR FUNCTIONS

The functions required to provide intraLATA switched toll services specified hereunder, e.g., recording and operating of intraLATA MTS, WATS, and 800 Service, shall be performed as shown in Exhibit B attached hereto.

## SECTION VII

### CONSTRUCTION AND PROTECTION OF PLANT

Each party will construct, equip, maintain and operate its system so as to provide adequate facilities for the efficient provision of good service to the public at all times.

Each party will take reasonable precautions in the location, construction and maintenance of its facilities for protection against hazard and interference from power lines and other sources.

## SECTION VIII

### MONTHLY COMPENSATION

Each party will collect all charges payable by its customers for intraLATA switched toll services in accordance with related tariff provisions and will account for and be responsible for such charges. Each party will keep adequate records of all collections, payments and other transactions hereunder, and such records will be subject to inspection by the other party upon reasonable request. Each party will furnish to the other such information as may be required for monthly compensation purposes. Compensation statements hereunder will be rendered monthly by the Bell Company to the Independent

Company and remittance in full, including disputed amounts, will be made by the debtor company by the last work day of the month following the month being settled. If a dispute is substantiated in favor of the exchange carrier, the fund will return the disputed amount plus interest (.05 percent per day). Disputes which cannot be resolved should be referred to the State Fund Oversight Committee for resolution.

## SECTION IX BASIS OF COMPENSATION

Monthly compensation due each party for facilities furnished and services provided hereunder will be determined as provided in Exhibit C attached hereto and made a part hereof.

## SECTION X DEFAULTS OR VIOLATIONS

If either party connects the facilities of the other party in any manner other than as specifically provided herein, this Annex is subject to immediate termination upon written notice.

## SECTION XI TERM OF ANNEX

This Annex will become effective on the date specified and will continue in force thereafter, until terminated upon thirty (30) days prior written notice with or without cause by either party. This Annex may be amended from time to time upon written agreement of the parties.

EXHIBIT A  
POINTS OF CONNECTION AND ROUTING  
INTRALATA SWITCHED TOLL SERVICES ANNEX

Effective: January 1, 1985

Attached to and made a part of the IntraLATA Switched Toll Services Annex  
effective January 1, 1985.

<u>EXCHANGES</u>	<u>INTRALATA TANDEM POP</u>	<u>POINTS OF CONNECTION</u>		<u>BELL COMPANY LATA</u>
		<u>V</u>	<u>H</u>	
Ethridge, 615-829	NSVLTNMT	7201	2704	Nashville, Tennessee
Leoma, 615-852	NSVLTNMT	7242	2700	Nashville, Tennessee
Loretto, 615-853	NSVLTNMT	7242	2700	Nashville, Tennessee
St. Josenh, 615-845	NSVLTNMT	7242	2700	Nashville, Tennessee

EXHIBIT B  
TRAFFIC RECORDING AND OPERATOR FUNCTIONS  
INTRALATA SWITCHED TOLL SERVICES ANNEX

Effective: January 1, 1985

Attached to and made a part of the IntraLATA Switched Toll Services Annex effective January 1, 1985.

From the effective date of this Exhibit, the Bell Company will perform or cause to be performed the recording and operator functions required for handling the traffic covered by this Annex, except that the Independent Company will perform the functions listed below.

Compensation for the provision of recording and operator functions, by one company for the other, is covered under separate Annexes.

<u>Traffic Originating At</u>	<u>Type of Traffic</u>	<u>Function(s) Performed</u>
None		

EXHIBIT C  
BASIS OF COMPENSATION  
INTRALATA SWITCHED TOLL SERVICES ANNEX  
Effective: January 1, 1990

Attached to and made a part of the IntraLATA Toll Switched Services Annex effective January 1, 1985.

This Exhibit sets forth the basis of compensation for all traffic covered by the IntraLATA Switched Toll Services Annex.

Compensation amounts which the Independent Company and the Bell Company are to receive for their participation in the handling of intrastate intraLATA switched toll services, as defined in the Annex shall be determined as set forth below.

A. For the purpose of compensation under this Exhibit:

1. Revenues are amounts chargeable to customers for intraLATA switched toll services (MTS, WATS and 800 Service) provided exclusively by exchange carriers under a common tariff filed by the Bell Company and concurred in by the Independent Company. Uncollectible revenues and revenue associated with official company toll calls are included. Each party accepts the responsibility for the collection efforts on revenues billed by it and on calls originating on its system which are returned under the Responsible Company Toll Investigation Plan.

- 2 -

2. Revenue Distribution Fund means a statewide common fund administered on a monthly basis containing all the intrastate intraLATA switched toll services revenues of the fund participants whereby each participant in the fund is reimbursed, from the fund, for costs incurred in the provision of said services and receives a share of the balance of any residual revenues.
3. Fund Participant means the Bell Company or an Independent Company which is a direct party to the sharing of intraLATA switched toll services revenues via the statewide revenue fund.
4. Fund Administrator which shall be the Bell Company is charged pursuant to the terms and conditions of this Annex with the establishment of administration procedures and the determination of compensation which each participant is entitled to receive from the revenue fund.
5. Access Function means a service function performed for and necessary to the provision of intraLATA switched toll service including switched access service similar to Feature Group C, billing and collection service, and directory assistance service as defined in the Exchange Carrier Association interstate access tariffs filed with the Federal Communication Commission. Access functions include recording, rating, billing, end office switching, transport, carrier common line, and toll directory assistance.

- 3 -

6. Network Function means a service function performed for and necessary to the provision of intraLATA switched toll service but which is not an access function as defined under the access tariffs.

The service function may be:

- a. Services provided by operators, including but not limited to, intraLATA toll operator assistance, toll operating, and intra-NPA Directory Assistance (DA) and/or,
- b. network functions, i.e., intraLATA tandem switching and/or line haul between the assumed POP locations for intraLATA switched toll service.

- B. Each fund participant shall receive monthly as its share of the revenues from intraLATA switched toll services, as defined on page 1 herein, for the period covered and in an amount to be determined as follows:

1. The Independent Company and all other fund participants shall remit the revenues as defined in Paragraph A.1. above to a common revenue fund via the Fund Administrator.
2. Each participant receives from the fund its access function compensation.
  - a. The amount of compensation is determined by applying the end office access charge tariff traffic sensitive, and billing and collection rates for those functions provided by the participant to the current month's intraLATA switched toll traffic provided under this Annex. The access tariff rates used in this calculation will be those

- 4 -

approved and in effect with the Federal Communications Commission as of June 1, 1985, for each participant. For purposes of determining intraLATA access charges, a point of presence (POP) will be assumed to exist at the end office side of each intraLATA tandem switch for each end office served by the switch.

- b. Where local transport is jointly provided and both companies involved have identical transport rates, the end office company will receive its local transport compensation by applying a Transport Split Factor (TSF) to the total calculated local transport charges for a given end office. The TSF will be computed using the following formula:

$$\text{TSF} = (1/2) \times 0.70* + [E/(E + P)] \times .30*$$

where E represents the airline mileage from the end office to the point of connection and where P represents the airline mileage from the intraLATA POP to the point of connection.

The POP Company shall receive its local transport compensation by applying the inverse TSF (1-TSF) to the total calculated local transport charges for a given end office.

\*Approximately seventy percent (70%) of the total transport cost is attributable to carrier/radio terminals while the remaining thirty percent (30%) is attributable to line facilities.

- 5 -

- c. Where local transport is jointly provided and the two companies involved have different transport rates, a composite equivalent rate will be developed for application to the minutes transversing the joint transport facility. The composite equivalent rate will be developed in a manner that will cover each company's transport rate for the portion of transport that it provides. In determining each company's transport rate for the portion of transport provided, the "seventy percent (70%) non-distance sensitive loading philosophy" employed in Paragraph 2.b. above will be utilized where appropriate. After determining each company's transport rate for the portion of transport provided, a Transport Split Factor (TSF) will be calculated that will represent the end office company's portion of total transport charges. The POP company shall receive its local transport compensation by applying the inverse TSF ( $1 - \text{TSF}$ ) to the total local transport charges for a given end office.
- d. Until such time as the parties develop the means to identify originating intraLATA OUTWATS usage by end user serving wire center, each company shall receive a percent of its monthly intrastate, intraLATA billed OUTWATS usage revenue as a surrogate for originating carrier common line access compensation. The percent to be used shall be 25% based on a composite ratio of carrier common line compensation per access minute compared to OUTWATS customer billed usage revenue per access minute. Since

- 6 -

the wire centers involved with the traffic sensitive elements of OUTWATS usage are easily identified, access compensation for the traffic sensitive elements of OUTWATS usage will be handled as described in Paragraphs B.2.a. through B.2.c. above. In addition, the OUTWATS billing company will be paid Billing and Collection compensation as referenced in Paragraph B.2.a. above.

Carrier Common line compensation for terminating OUTWATS usage will be handled as described in Paragraphs B.5. and B.6. (as appropriate) below.

- e. Until such time as the parties develop the means to identify terminating 800 Service usage by end user serving wire center, each company shall receive a percent of its monthly intrastate, intraLATA billed 800 Service usage revenue as a surrogate for terminating carrier common line access compensation.

The percent to be used shall be 25% based on a composite ratio of carrier common line compensation per access minute to 800 Service customer billed usage revenue per access minute. Due to the many complexities associated with properly processing 800 Service usage records, compensation for the traffic sensitive and originating carrier common line elements for 800 Service usage will be accomplished through residual revenue distribution as outlined in Paragraph B.7. below. In addition, the 800 Service billing company will be paid Billing and Collection compensation as referenced in Paragraph B.2.a. above.

- 7 -

3. The expenses incurred by the Fund Administrator in the administration of the revenue distribution fund shall be reimbursed from the fund. The expenses will be monitored and subject to review by the Revenue Distribution Fund Oversight Committee.
4. Each participant will receive from the fund its monthly compensation associated with its network functions as defined in Paragraph A.6. above.  
The monthly network function compensation will be determined by:
  - a. An annual cost study conducted under the principles described in Paragraph C following;
  - b. Dividing the network function cost as determined in the annual cost study by the total access minutes of use (utilizing such network function) for the cost study period, in order to obtain a network cost per minute of use; and
  - c. Multiplying the network cost per minute of use by the total access minutes of use (utilizing such network functions) for the monthly settlement period.
5. The Independent Company will receive a company specific residually computed carrier common line rate of 5.4025 cents per minute applied to the originating and terminating access minutes of intraLATA traffic in which it participates (excluding all 800 Service usage and originating OUTWATS usage).

- 8 -

6. The Bell Company will receive a company specific residually computed carrier common line rate of 1.1990 cents per minute applied to the originating and terminating access minutes of intraLATA traffic in which it participates (excluding all 800 Service usage and originating OUTWATS usage).
  7. The balance of revenues remaining in the fund after the payments made under Paragraphs B.2. through B.6. above will be allocated to the participants on the basis of the relative number of access lines of each participant. If insufficient revenues are available to cover these payments, the shortfall will be allocated among the participants on the basis of relative number of access lines.
  3. Any fund participant who directly or through an affiliated entity engages in a facility based interexchange carrier venture that is competing for the intraLATA toll revenues shared by the fund participants will not be entitled to the residual revenue distribution described in Paragraph B.7. above.
- C. When a cost study is required as described in Paragraph B.4. above, the study shall be conducted according to the principles outlined below:
1. The cost study shall be governed by the separation principles and procedures set forth in the then effective National Association of Regulatory Utility Commissioners (NARUC) - FCC Separations Manual, Part 67 of the FCC's Rules and Regulations and Part 69 of the FCC's Rules and Regulations.

- 9 -

2. Investments, reserves, and expenses included in the cost study shall be those recorded on the participant company's books in accordance with the FCC Uniform System of Accounts, Part 31. Only those investments, reserves and expenses that are mutually agreed upon as incurred, used and useful for the provision of the intraLATA switched toll services covered by this Exhibit shall be included in the cost study.
3. A 12.75 percent rate of return on net plant will be applied in the study.
4. Depreciation expenses used will be the booked depreciation expenses of the participant company for the study period at the rates authorized by the state Public Service Commission.
5. Federal and State Income Taxes shall be computed on the basis of the statutory rates applicable to the participant company during the study period, considering fixed charges and return as determined in Paragraph C.3. above. Fixed charges of the participant company assigned to the study shall be determined by multiplying the participant company's total fixed charges for the study period by the ratio of the net book costs assigned to the study to the total net book costs of the participant company for the study period. The fully allocated amounts of all statutory adjustment used by the participant company for determining Federal and State Income Taxes applicable to the study period will be used in determining net taxable income for compensation under this Exhibit.

- 10 -

Reductions from federal Income Tax liability resulting from Investment Tax Credits must be treated as study adjustments in the same manner as accounted for by the parties.

6. Traffic studies shall be made in the participant company's switches as mutually selected and in accordance with procedures mutually agreed upon by both parties. Operator Work Time Values used will be the applicable industry standard.

D. The Revenue Fund shall be administered on a calendar month basis utilizing calendar month toll revenues, messages and usage. The Fund Administrator shall coordinate the monthly gathering of any required data from the participant companies and produce statements for the fund as detailed below:

1. Each participant shall report or have reported to the Fund Administrator its calendar month toll revenues, messages and usage by the tenth work day following the close of that calendar month.
2. The Fund Administrator shall provide by the twelfth work day following the close of the calendar month a statement for each participant detailing the following:
  - a. Toll Revenues due the fund from the participant.
  - b. Access charge based compensation due the participant from the fund.
  - c. Network costs due the participant from the fund.
  - d. Residual share due the participant from the fund.
  - e. Net cash flow to or from the fund.

- 11 -

A worksheet showing the calculation of the residual compensation amount per access line will also be supplied.

3. Each participant company having a cash flow to the fund shall tender payment in full to the Fund Administrator by the last work day of the month following the close of the calendar month under study. Subject to the discretion of the Fund Administrator, a late payment fee of .05 percent per day may be charged on balances due after the above date.
  4. The Fund Administrator will send payment to each participant company having a cash flow from the fund on the last work day of the month following the close of the calendar month under study.
  5. Any studies or data supporting amounts received from the fund by any participant will be subject to review by the fund administrator and/or any other fund participants.
- E. A State Revenue Distribution Fund Oversight Committee will be established and will be comprised of the Fund Administrator and six Independent Company representatives as appointed by the State Telephone Association. The Committee responsibilities will include: review of the Fund Administration procedures and operations to insure compliance with this Annex; review of the administration expenses; provision of input to the Bell Company's toll rate filing; monitoring the network costs charged to the fund; and making recommendations on any disputes brought before the committee.

BI3C  
(1/1/90)

This BI3, Exhibit C, cancels and supersedes the BI3, Exhibit C  
executed August 1, 1989.

Executed this 8<sup>th</sup> day of May, 1990.

WITNESS:

SOUTH CENTRAL BELL TELEPHONE CO.

Sannie Deatheridge

D. Thompson  
Asst. Vice President-Public Affairs

WITNESS:

LORETTO TELEPHONE COMPANY

Risa Stevens

Louise Brown, President  
Title:

EXHIBIT D  
BASIS OF COMPENSATION  
INTERSTATE INTRALATA SWITCHED TOLL SERVICES

Effective January 1, 1988

Attached to and made a part of the IntraLATA Toll Switched Services Annex effective January 1, 1985.

This Exhibit sets forth the basis of compensation for interstate intraLATA message toll traffic. General terms and conditions of the Annex apply to interstate message toll traffic.

A. For the purpose of this Exhibit:

1. Revenues are amounts chargeable to customers for interstate intraLATA switched toll services provided exclusively by exchange carriers under a common tariff filed by the Bell Company. Uncollectible revenues and revenues associated with official independent company toll calls are included. Each party accepts the responsibility for the collection efforts on revenues billed by it and on calls originating on its system which are returned under the Responsible Company Toll Investigation Plan.

2. Access functions means those functions provided in accordance with carrier access service tariffs on file with the Federal Communications Commission. Access functions include transport, end office switching and carrier common line.
  3. Billing and Collection functions are the recording, processing, billing and collection of interstate intraLATA toll services.
  4. Network function means a service function performed for and necessary to the provision of intraLATA switched toll service but which is not an access function or billing and collection function. The service function includes toll operator assistance, intraNPA directory assistance, intraLATA tandem switching and transmission between intraLATA tandem switches.
- B. Revenues billable by the Bell Company and by the Independent Company are due the Bell Company.
- C. The Independent Company shall receive for its participation the following:
1. Access compensation determined by applying the lawfully filed interstate access tariff of the independent company (or other interstate access tariff in which the independent company concurs) to the intraLATA switched toll traffic covered in this annex.

2. Network compensation determined by applying to the intraLATA switched toll traffic covered in this annex, the same per minute rates used for the intrastate, intraLATA network functions covered in Exhibit C of this annex. In the event the independent company provides operator functions in conjunction with maritime service, such operator compensation may be based upon a study of such interstate costs following the procedures defined in Exhibit C.
  
3. Billing and Collection compensation determined by applying to the intraLATA toll minutes covered in this annex, the same compensation per minute applicable to interstate interLATA billing and collection functions performed by the Independent Company for AT&T Communications. This per minute amount may be determined by the Independent Company based upon a mutually agreed representative study and shall include reasonable amounts for uncollectibles.

Executed this 21st day of April 1988.

WITNESS:

SOUTH CENTRAL BELL TELEPHONE COMPANY

Linda Bianchi

[Signature]

Assistant Vice President-Public Affairs  
(Title)

WITNESS:

LORETTO TELEPHONE COMPANY  
(Independent Company)

Linda K. Hutchins

[Signature]

President  
(Title)

LB 4/24/04 JLB

DH \_\_\_\_\_

**Carolyn Thompson**

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**From:** AJ Passarella  
**Sent:** Monday, May 24, 2004 9:27 AM  
**To:** LTC MGRS  
**Subject:** FW: Rural Telco Industry Makes Best Effort to Meet May 24 LNPDeadline



052404LNPDeadline.pdf



052404LNPFactsheet.pdf

-----Original Message-----

**From:** Martha Silver [mailto:MKS@OPASTCO.ORG]  
**Sent:** Monday, May 24, 2004 9:04 AM  
**Cc:** AJ Passarella  
**Subject:** Rural Telco Industry Makes Best Effort to Meet May 24 LNPDeadline

From NTCA and OPASTCO:

Attached is a media advisory and a fact sheet released today regarding intermodal local number portability. The media advisory covers some of the many LNP challenges that still exist for rural telcos and their customers, and the Association's upcoming LNP case with the U.S. Court of Appeals for the District of Columbia. The fact sheet provides examples of rural telcos that were required to be ready for intermodal LNP last November, as part of the Top 100 MSAs deadline, and the number of customer requests they have received to port numbers.

If you have any questions, please contact me:

Martha Silver  
OPASTCO  
202/659-5990  
mks@opastco.org

FOR IMMEDIATE RELEASE  
May 24, 2004

Contacts: Aaryn Slafky, NTCA  
703/351-2087  
Martha Silver, OPASTCO  
202/659-5990

**FACT SHEET ON INTERMODAL LOCAL NUMBER PORTABILITY  
DEMAND IN RURAL AREAS**

***Rural Companies in Top 100 MSAs Incur Costs to Offer Intermodal Local Number  
Portability Find Little Consumer Demand***

The companies listed below are a sample of rural telephone companies that serve, in part, customers within one of the Top 100 MSAs. Telephone companies with customers in the Top 100 MSAs were required to be ready for intermodal local number portability on Nov 24, 2003; the rural companies in this sample were later given a deadline extension until May 24, 2004. Customers of these rural companies, because of their location within a Top 100 MSA, were exposed to LNP advertising and media coverage, yet, customer requests, independent of the deadline extension, suggest an extremely limited customer demand.

**Bijou Telephone Cooperative Association, Byers, CO**

MSA: Denver, CO

Number of Requests from Customers to Port Their Numbers 0

**DTC Communications, Alexandria, TN**

MSA: Nashville, TN

Number of Requests from Customers to Port Their Numbers 0

**Enhanced Telecommunications Corp., Sunman, IN**

MSA: Cincinnati, Ohio--KY--IN

Number of Requests from Customers to Port Their Numbers 0

**Griswold Cooperative Telephone, Griswold, IA**

MSA: Omaha, NE--IA

Number of Requests from Customers to Port Their Numbers 0

**Palmetto Rural Telephone Cooperative, Walterboro, SC**

MSA: Charleston, SC

Number of Requests from Customers to Port Their Numbers 1

**Pioneer Telephone Cooperative, Kingfisher, OK**

MSA: Oklahoma City, OK

Number of Requests from Customers to Port Their Numbers 0

**Sierra Telephone, Oakhurst, CA**

MSA: Fresno, CA

Number of Requests from Customers to Port Their Numbers 0

**Wheat State Telephone, Udall, KS**

MSA: Wichita, KS

Number of Requests from Customers to Port Their Numbers 2

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FOR IMMEDIATE RELEASE  
May 24, 2004

Contacts Aaryn Slafky, NTCA  
703/351-2087  
Martha Silver, OPASTCO  
202/659-5990

## **RURAL TELCO INDUSTRY MAKES BEST EFFORT TO MEET MAY 24 LNP DEADLINE**

*State Public Utility Commissions Grant Waivers to Telcos that  
Prove Deadline Technically Unfeasible*

*Rural Consumers Still Face Potential Harm and Confusion by Unclear Rules*

*NTCA and OPASTCO Set to File LNP Appeal Brief to U.S. District Court of Appeals May 25*

WASHINGTON – Across the country, rural telephone companies have faced many challenges in their efforts to meet today's intermodal local number portability (LNP) deadline according to the National Telecommunications Cooperative Association (NTCA) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO). These challenges include vendors' inability to provide equipment and training before the deadline, high implementation costs that may have to be recovered through a telco's relatively small subscriber base, and confusion over interconnection and federal LNP rule issues that could harm consumers and the rural telephone companies

In some of these cases, challenges have been so great that companies have appealed to their state public utility commissions (PUCs) seeking additional time to implement LNP properly, so that consumers are not adversely affected by the FCC's existing rules, which could cause unexpected long distance charges and high cost-recovery fees. State regulators were given authority in the Telecommunications Act of 1996 to suspend or modify LNP deadlines when necessary. PUCs in as many as 37 states have granted waivers to wireline telephone companies, based on the technical challenges for rural telcos created by the existing FCC framework for LNP implementation.

After filing a Petition for Partial Stay and Clarification with the FCC and receiving no substantive clarification of the LNP rules, the associations filed a petition for review with the U.S. Court of Appeals for the District of Columbia, which was granted. The filing brief deadline is tomorrow, May 25. The associations' case will argue that the FCC did not comply with the Regulatory Flexibility Act and the Administrative Procedure Act before imposing the wireline to

-more-

## NTCA and OPASTCO/2-2-2

wireless number portability requirements contained in the docket. If the FCC had followed these required legal procedures, many of the challenges facing rural wireline telcos and their customers could have been resolved, which would have saved companies and customers from the probable negative financial consequences of the current LNP rules. NTCA and OPASTCO's LNP case has been combined with the United States Telecom Association (USTA) and CenturyTel's related case, and will be reviewed together by the court.

###

### Background

The associations first filed a Petition for Partial Stay and Clarification with the FCC on Nov. 21, 2003. The associations sought a partial stay and clarification of the FCC's wireline-to-wireless local number portability (LNP) order and the November 24 implementation deadline with respect to small and mid-sized incumbent local exchange carriers (ILECs). The associations contended that the November 24 compliance deadline for all carriers operating within the top 100 MSAs is not reasonable for 2% carriers (those who individually serve less than 2% of the nation's access lines), since the FCC only provided carriers with the guidance November 10. In addition, the associations argued that the FCC failed to address many important issues, which must be resolved before the 2% carriers can effectively implement inter-modal LNP.

The associations then filed a petition for review of LNP with the U.S. Court of Appeals for the District of Columbia on Dec. 15, 2003. The petition was accepted and a brief filing is due May 25, 2004. Oral arguments have been scheduled for Nov. 18, 2004.

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### About NTCA:

The National Telecommunications Cooperative Association (NTCA) is a premier association representing more than 550 locally owned and controlled telecommunications cooperatives throughout rural and small-town America. NTCA provides its members with legislative, regulatory, and industry representation, meetings, publications, and educational programs, and an array of employee benefit programs. Visit us at <http://www.ntca.org>

### About OPASTCO

The Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) represents more than 560 small, independently owned, local telecommunications companies serving primarily rural areas of the United States and Canada. OPASTCO membership includes both commercial companies and cooperatives, which range in size from fewer than 100 to 100,000 access lines, and collectively serve more than 3.5 million customers. OPASTCO represents rural telecommunications interests before federal regulatory bodies and Congress, provides publications, and holds two conventions annually in January and July of each year, addressing the needs of the small telecommunications industry. The association has an affiliate 501(c)(3) nonprofit, the Foundation for Rural Education and Development (FRED). Visit the OPASTCO Web site at [www.opastco.org](http://www.opastco.org)

KRASKIN, LESSE & COSSON, LLC  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

October 31, 2003

**VIA OVERNIGHT DELIVERY**

Linda Godfrey  
Interconnection, Numbering and Mandates  
Verizon Wireless  
2785 Mitchell Drive  
Walnut Creek, CA 94598

Dear Ms. Godfrey:

Our firm represents Loretto Telephone Company, Inc., a local exchange carrier that has received correspondence from Verizon Wireless regarding number portability. Having analyzed the letter and accompanying form (collectively, the Verizon Wireless mailing") sent to this company, we question whether the mailing constitutes a valid request for number portability. Additionally, the Verizon Wireless correspondence does not request service provider portability that would enable customers of this LEC to retain its existing telephone number "at the same location" as the Act and FCC Rules require.<sup>1</sup>

The mailing seeks only switch information rather than request the implementation of number portability.<sup>2</sup> The process of responding to the information request has been "simplified" by Verizon Wireless by allowing carriers to update the attached form, which has been provided for this purpose. This attachment is comprised of a generic form with no carrier or market information indicated and a spreadsheet containing the switch information referenced in the letter. Accordingly, the mailing fails to "specifically request portability" and "identify the discrete geographic area" as required by FCC Rules.<sup>3</sup> Furthermore, if the mailing was intended

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*See 47 U.S.C. § 153(30); 47 C.F.R. § 52.21(k).*

<sup>2</sup> According to the letter, the purpose of the mailing is pursuant to a specific FCC Rule which requires carriers to provide, upon request, "a list of their switches for which provisioning of number portability has been requested (and therefore provided) and a list of their switches for which provisioning of number portability has not been requested." Please be advised that the switch information that Verizon Wireless provided on the attached form is correct. The switches are not number portable-capable.

<sup>3</sup> *See In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability; Fourth Report and Order in CC Docket No. 99-200 and CC Docket No. 95-116, and Fourth*

to constitute a request for a LEC, which currently is not number portable-capable, to implement number portability by November 24, 2003, the request, in these instances, was not timely made.<sup>4</sup>

The Act and the FCC have defined the obligation of a LEC to provide number portability that enables the "users of telecommunication services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another."<sup>5</sup> If you have facts to indicate that Verizon Wireless plans to ensure that the customer retains his/her telephone number "at the same location" please provide us with those facts and we will reevaluate our analysis of the Verizon Wireless request on the basis of these facts.

While we and our client recognize that pursuant to Section 252 of the Act, carriers are free to "negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of Section 251,"<sup>6</sup> our client at this time has no need or desire to negotiate an agreement that goes beyond the standards the FCC has set forth pursuant to Section 251. As noted, the geographic portability that would result from the Verizon Wireless request has not been required by the FCC under Section 251.

Again, we would be pleased to review any additional facts Verizon Wireless may offer to demonstrate that its request is not for geographic number portability.

Sincerely,

Kraskin, Lesse & Cosson, LLC

By: 

---

*Further Notice of Proposed Rulemaking in CC Docket No. 99-200, CC Docket Nos. 99-200, 96-98, 95-116 (rel. June 18, 2003) at para. 10 ("Requesting telecommunications carriers must specifically request portability, identify the discrete geographic area covered by the request, and provide a tentative date by which the carrier expects to utilize number portability to port prospective customers").*

<sup>4</sup> See 47 C.F.R. § 52.23(b)(2)(iv).

<sup>5</sup> 47 U.S.C. § 153(30) (emphasis supplied); 47 C.F.R. § 52.21(k) (emphasis supplied). The FCC has distinguished this "service provider portability" from "location portability," a much different form of portability that the FCC has determined is not required by statute. "Location portability" is defined as "the ability of users of telecommunications services to retain existing telecommunications numbers without impairment of quality, reliability, or convenience when moving from one physical location to another." 47 C.F.R. § 52.21(i) (emphasis supplied).

<sup>6</sup> 47 U.S.C. § 252(a)(1).

KRASKIN, LESSE & COSSON, LLC  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

October 10, 2003

**VIA OVERNIGHT DELIVERY**

Bonnie Petti  
Executive Director  
Network Operations Headquarters Staff  
Verizon Wireless  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS7-1  
Walnut Creek, CA 94598

Dear Ms Petti:

Our firm represents several local exchange companies ("LECs") that have received correspondence from Verizon Wireless requesting specific company information and seeking to "establish an Intercarrier Communications Process" between Verizon Wireless and our LEC clients ("LNP Agreement and Information Requests").<sup>1</sup> The FCC's orders and rules require local exchange carriers to implement number portability only "in switches for which another carrier has made a specific request."<sup>2</sup> As demonstrated by the attached Letter, the requests for these clients to implement number portability are being challenged as to their validity and whether they are in accordance with FCC rules. Until these matters are resolved, it is unnecessary for these companies to respond to the LNP Agreement and Information Requests.

Additionally, as indicated on the Attachment, some companies have received only this most recent correspondence from Verizon Wireless. FCC rules require that requests to port must "specifically request portability" and "identify the discrete geographic area covered by the request."<sup>3</sup> Because the LNP Agreement and Information Requests do not meet these

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<sup>1</sup> See attached letter to Linda Godfrey, Interconnection, Numbering and Mandates, Verizon Wireless dated July 23, 2003 ("Letter") with updated attachment ("Attachment"). The Attachment contains a list of the clients that we represent in this matter.

<sup>2</sup> See, e.g., *In the Matter of Telephone Number Portability: First Memorandum Opinion and Order on Reconsideration*, 12 FCC Rcd 7236, 7273 (1997); 47 C.F.R. § 52.23(c).

<sup>3</sup> See *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability: Fourth Report and Order in CC Docket No. 99-200 and CC Docket No. 95-116, and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 99-200*, CC Docket Nos. 99-200, 96-98, 95-116 (rel. June 18, 2003) at para. 10.

Ms Bonnie Petti  
October 10, 2003  
Page 2

qualifications and fail to demonstrate that it is not seeking geographic portability, the correspondence does not constitute a valid request. Accordingly, these companies are under no obligation to implement number portability or provide information for such purposes.

Sincerely,

Kraskin, Lesse & Cosson, LLC

By: 

cc: Linda Godfrey

Attachments

KRASKIN, LESSE & COSSON, LLC  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

July 23, 2003

**VIA E-MAIL & OVERNIGHT DELIVERY**

Linda Godfrey  
Interconnection, Numbering and Mandates  
Verizon Wireless  
2785 Mitchell Drive  
Walnut Creek, CA 94598

Dear Ms. Godfrey,

Our firm represents several local exchange carriers that have received correspondence from Verizon Wireless regarding number portability.<sup>1</sup> Having analyzed the letters and accompanying forms (collectively, the Verizon Wireless mailings") sent to these companies, we question whether the mailings constitute a valid request for number portability. Moreover, even if the mailings were sufficient, the Verizon Wireless correspondence does not request service provider portability that would enable customers of these LECs to retain their existing telephone numbers "at the same location" as the Act and FCC Rules require.<sup>2</sup>

The mailings seek only switch information rather than request the implementation of number portability.<sup>3</sup> The process of responding to the information request has been "simplified" by Verizon Wireless by allowing carriers to update the attached form, which has been provided for this purpose. This attachment is comprised of a generic form with no carrier or market information indicated and a spreadsheet containing the switch information referenced in the letter. Accordingly, the mailing fails to "specifically request portability" and "identify the discrete geographic area" as required by FCC Rules.<sup>4</sup> Furthermore, although the generic form

<sup>1</sup> A list of these companies is attached.

<sup>2</sup> See 47 U.S.C. § 153(30); 47 C.F.R. § 52.21(k).

<sup>3</sup> According to the letter, the purpose of the mailing is pursuant to a specific FCC Rule which requires carriers to provide, upon request, "a list of their switches for which provisioning of number portability has been requested (and therefore provided)." The carriers on the attached list have either responded to this information request directly or we are responding on their behalf.

<sup>4</sup> See *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability*:

specifies the date of the request as May 19, 2003, many of the letters are dated May 28, 2003 with postmark dates well into the month of June. Accordingly, if the mailing was intended to constitute a request for a LEC, which currently is not number portable-capable, to implement number portability by November 24, 2003, the request, in these instances, was not timely made.<sup>5</sup>

The mailing fails to indicate whether Verizon Wireless provides service within the companies' respective LEC service areas. The rules specify that number portability is required only if requested by "another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate."<sup>6</sup> Furthermore, for most of the companies, there is no local interconnection in place between Verizon Wireless and the LEC, demonstrating the absence of Verizon Wireless' local presence and any indication of its "plans to operate" within the area.

The Act and the FCC have defined the obligation of a LEC to provide number portability that enables the "users of telecommunication services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another."<sup>7</sup> If you have facts to indicate that Verizon Wireless plans to ensure that the customer retains his/her telephone number "at the same location" please provide us with those facts and we will reevaluate our analysis of the Verizon Wireless request on the basis of these facts.

While we and our clients recognize that pursuant to Section 252 of the Act, carriers are free to "negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of Section 251,"<sup>8</sup> our clients at this time has no need or desire to negotiate an agreement that goes beyond

---

*Fourth Report and Order in CC Docket No. 99-200 and CC Docket No. 95-116, and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 99-200, CC Docket Nos. 99-200, 96-98, 95-116 (rel. June 18, 2003) at para. 10 ("Requesting telecommunications carriers must specifically request portability, identify the discrete geographic area covered by the request, and provide a tentative date by which the carrier expects to utilize number portability to port prospective customers").*

<sup>5</sup> See 47 C.F.R. § 52.23(b)(2)(iv).

<sup>6</sup> 47 C.F.R. § 52.23(c).

<sup>7</sup> 47 U.S.C. § 153(30) (emphasis supplied); 47 C.F.R. § 52.21(k) (emphasis supplied). The FCC has distinguished this "service provider portability" from "location portability," a much different form of portability that the FCC has determined is not required by statute. "Location portability" is defined as "the ability of users of telecommunications services to retain existing telecommunications numbers without impairment of quality, reliability, or convenience when moving from one physical location to another." 47 C.F.R. § 52.21(i) (emphasis supplied).

<sup>8</sup> 47 U.S.C. § 252(a)(1)

Ms Linda Godfrey  
July 23, 2003  
Page 3

the standards the FCC has set forth pursuant to Section 251. As noted, the geographic portability that would result from the Verizon Wireless request has not been required by the FCC under Section 251.

Again, we would be pleased to review any additional facts Verizon Wireless may offer to demonstrate that its request is not for geographic number portability.

Sincerely,

Kraskin, Lesse & Cosson, LLC

By: 

Attachment

**ATTACHMENT**  
**Updated List of Local Exchange Companies Represented by Kraskin, Lesse & Cosson,**  
**LLC in Matters Pertaining to Correspondence From Verizon Wireless**  
**Regarding Number Portability**

**October 10, 2003**

Adams Telephone Cooperative \*  
Advanced Tel, Inc. \*  
Alenco Communications, Inc. \*  
Armstrong Telephone Company of New York  
Ben Lomand Rural Telephone Cooperative, Inc.  
Bentleyville Telephone Company  
Berkshire Telephone Corporation \*  
Big Sandy Telecom  
Blountsville Telephone Company, Inc.  
Brindlee Mountain Telephone Company \*  
Canby Telephone Association  
Cap Rock Telephone Company, Inc. \*  
Cascade Utilities, Inc.  
Cassadaga Telephone Corporation \*  
Clay County Rural Telephone Cooperative, Inc.  
Concord Telephone Company  
Copper Valley Telephone Company \*  
C-R Telephone Company \*  
Colorado Valley Telephone Cooperative \*  
ComSouth Telecommunications, Inc. \*  
Deerfield Farmers' Telephone Company  
EATEL  
Egyptian Telephone Cooperative Association \*  
Egyptian Communications Services, Inc.  
Ellijay Telephone Company  
FreTel Communications, LLC \*  
Gallatin River Communications  
Germantown Telephone Company, Inc. \*  
Glenwood Telephone Company \*  
Gulf Telephone Company  
Hancock Rural Telephone Corporation  
Laurel Highland Telephone Company  
Loretto Telephone Company, Inc. \*  
Madison River Communications  
Marianna-Scenery Hill Telephone Co.  
Margaretville Telephone Company, Inc. \*  
McDonough Telephone Cooperative, Inc. \*  
MebTel, Inc.

Nelson Telephone Cooperative  
Nextgen Telephone Inc.  
North Central Telephone Cooperative, Inc  
North Pennsylvania Telephone Company  
North Pittsburgh Telephone Company  
North State Telephone Company  
Orwell Telephone Company  
Otelco Telephone LLC  
Pattersonville Telephone Company  
Piedmont Rural Telephone Cooperative, Inc.  
Ringgold Telephone Company  
Rio Virgin Telephone Company, Inc.  
Rock Hill Telephone Company d/b/a Comporium Communications  
SEI Data, Inc.  
Smart City Telecom LLC d/b/a Smart City Telecom \*  
Smithville Telephone Company, Inc.  
Springboard Telecom \*  
State Telephone Company  
Taconic Telephone Corporation  
Telepak Networks, Inc.  
The Middleburgh Telephone Company  
Yukon-Waltz Telephone Company \*  
Valley Telecom Group d/b/a Valley Telephone Cooperative, Inc. \*  
West Carolina Rural Telephone  
West Wisconsin Communications Systems, Inc.  
Woodhull Community Telephone Company \*  
YCOM

\* Received LNP Agreement and/or Information Request but did not receive correspondence from Linda Godfrey requesting implementation of number portability.

LORETTO TELEPHONE COMPANY, INC.  
COST ESTIMATES FOR LOCAL NUMBER PORTABILITY

	<u># OF HOURS</u>	<u>COST PER HOUR</u>	<u># OF EMPLOYEES</u>	<u>TOTAL</u>
CENTRAL OFFICE LABOR	12	\$60.00		\$720.00
BILLING SOFTWARE CHARGES	10	\$150.00		\$1,500.00
CUSTOMER SERVICE TRAINING:				
CUSTOMER SERVICE REP TRAINING	2	\$20.00	8	\$320.00
MANAGEMENT TRAINING	10	\$60.00		\$600.00
LNP SEMINAR				\$400.00
LNP SEMINAR - TIME & EXPENSE				\$676.83

	<u>QUERIES PER MONTH</u>		<u>MONTHS PER YEAR</u>	<u>COST PER YEAR</u>
QUERY EXPENSE:	35,000.00	0.001761	12	\$739.62
5 YEAR TOTAL QUERY COST (ASSUMES A 10% INCREASE EACH YEAR)				\$4,608.01

	<u>COST</u>	<u>NUMBER</u>	<u>TOTAL</u>
CUSTOMER EDUCATION EXPENSE:			
MAILOUTS	\$2,500.00	2	\$5,000.00
ADVERTISING (RADIO, NEWSPAPER)			\$1,200.00
EMPLOYEE TIME TO ANSWER QUESTIONS			\$700.00

	<u>COST PER HOUR</u>	<u># OF SVC ORDERS</u>	<u>TOTAL</u>
SERVICE ORDER ADMINISTRATION CHARGES:			
FIRST YEAR	\$30.00	100	\$3,000.00
SECOND THRU FIFTH YEAR (ADMIN & PERSONNEL TIME)			\$20,950.00

**TOTAL ESTIMATED COST TO IMPLEMENT LNP OVER 5 YEARS: \$39,674.84**

RECEIVED

2004 MAY 27 PM 2:02

T.R.A. DOCKET ROOM

MILLINGTON TELEPHONE COMPANY

**MILLINGTON TELEPHONE COMPANY INC  
GENERAL EXCHANGE TARIFF**

**BASIC LOCAL EXCHANGE SERVICES**

TRA No. 1

Section 3

1<sup>st</sup> Revised Page 3

Cancels Original Page 3

**3.3 Extended Calling Areas**

The rates listed in Section 3.2 entitle a subscriber to an unlimited number of messages to stations in his serving exchange and also to those in the exchanges shown below under "Extended Calling Area" opposite his serving exchange.

Exchange	Extended Calling Area	
Millington	Shelby Forest, Rosemark, Munford, Drummonds, Mason 294 & 594, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*, Somerville*, Moscow*.	C
Shelby Forest	Millington, Rosemark, Munford, Drummonds, Mason 294 & 594, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*, Somerville*, Moscow*.	C
Rosemark	Millington, Shelby Forest, Munford, Drummonds, Mason 294 & 594, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*, Mason 294 & 594, Somerville*, Moscow*.	C
Drummonds	Munford, Millington, Shelby Forest, Rosemark, Mason 294 & 594, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*.	C
Munford	Drummonds, Millington, Shelby Forest, Rosemark, Mason 294 & 594, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*.	C
Stanton	<b>Drummonds, Mason (294 &amp; 594), Millington, Munford, Rosemark, Shelby Forest, Brownsville*</b>	C
Mason (294)	Munford, Drummonds, Shelby Forest, Rosemark, Millington, <b>Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Covington*.	C
Mason (594)	<b>Munford, Drummonds, Shelby Forest, Rosemark, Millington, Stanton</b> , Memphis*, Germantown*, Arlington*, Collierville*, Somerville*.	C

\*BellSouth Exchanges

ISSUED: December 9, 2003

EFFECTIVE: January 19, 2004

**MILLINGTON TELEPHONE COMPANY, INC.**

4880 NAVY ROAD • MILLINGTON, TENN. 38053 • PHONE (901) 872-3311

October 6, 2003

Ms. Sharon Cañas  
Network Operations Headquarters Staff  
Verizon Wireless  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Re: *Proposed Wireline-Wireless Local Number Portability Agreement*

Dear Ms. Cañas:

We are in receipt of the letter dated October 1, 2003 from Bonnie R. Petti, regarding a proposed Wireline-Wireless Local Number Portability agreement between Verizon Wireless ("VZW") and Millington Telephone Company, Inc. ("Millington"). Although we appreciate VZW's interest in establishing such an agreement with Millington, we do not recognize the need for such an arrangement at this time.

It is Millington's belief that current Federal Communications Commission ("FCC") rules do not require wireline to wireless number portability (inter-modal) or location number portability. Consequently, until such time the FCC changes its existing rules, Millington believes entering into an agreement for number portability between our two companies is premature and not required.

In addition, VZW has failed to recognize or has chosen to ignore Millington's previous correspondence to VZW on June 4, 2003 in response to the letter dated May 21, 2003. A copy of this letter is attached.

Thank you for your cooperation in this matter.

Sincerely,

  
David Espinoza  
Controller

cc: Bonnie R. Petti, Verizon Wireless

Enclosure



W. S. HOWARD, President-Manager

## MILLINGTON TELEPHONE COMPANY, INC.

4880 NAVY ROAD • MILLINGTON, TENN. 38053 • PHONE (901) 872-3311

December 2, 2003

Ms. Suzy Nieman  
Manager, Carrier Relations  
AT&T Wireless Services  
7277 164<sup>th</sup> Avenue NE  
Redmond, WA 98052

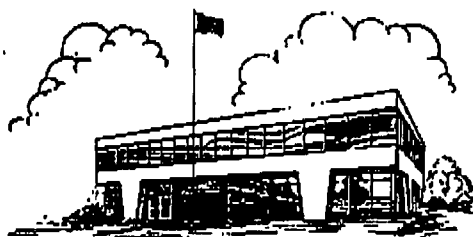
Dear Ms. Nieman:

This letter is to confirm that on November 25, 2003 Millington Telephone Company, Inc. ("Millington") received your letter regarding Local Number Portability (LNP), dated November 21, 2003. The letter references an attachment, but there was no attachment with the letter Millington received from AT&T Wireless.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Espinoza".

David Espinoza  
Controller

*Cingular*

W. S. HOWARD, President-Manager

**MILLINGTON TELEPHONE COMPANY, INC.**

4880 NAVY ROAD • MILLINGTON, TENN. 38053 • PHONE (901) 872-3311

December 4, 2003

Susan Riley  
Sr. Interconnection Manager  
Supply Chain Management  
5565 Glenridge Connector, Suite 1520  
Atlanta, GA 30342

Re: *Local Number Portability*

Dear Ms. Riley:

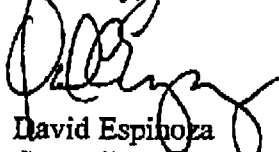
Millington Telephone Company ("Millington") is in receipt of your November 28, 2003 letter regarding number portability and the proposed Trading Partner Profile.

We are in the process of reviewing your request. In the mean time, the point of contact for information you requested regarding LNP matters is as follows:

David Espinoza  
Controller  
Millington Telephone Co., Inc.  
4880 Navy Road  
Millington, TN 38053  
(901)872-5150- phone  
(901)872-2722- fax

You may contact me if you have any further questions.

Sincerely,



David Espinoza  
Controller

NORTH CENTRAL TELEPHONE  
COOPERATIVE, INC.

RECEIVED

2004 MAY 27 PM 2:02

T.R.A. DOCKET ROOM



# 1.11

**NORTH CENTRAL TELEPHONE COOPERATIVE  
INCORPORATED  
LOCAL EXCHANGE TARIFF**

**PSC KY TARIFF NO. 3  
SECTION C  
Original Sheet No. 5**

**BASIC LOCAL EXCHANGE SERVICE (Cont'd)**

**C.2 Local Calling Areas**

**C.2.1 General**

The rates in this Tariff entitle callers to receive local calling (i.e., toll-free) to the local calling areas indicated in Section C.2.2, below. Calls to areas not listed in Section C.2.2 will be subject to applicable long distance charges by the long distance provider.

**C.2.2 List of Local Calling Exchanges**

Exchange (NPA is 615 unless otherwise noted)

Hillsdale (633)  
Westmoreland (644)  
Green Grove (655)  
Lafayette (666,688)  
Pleasant Shade (677)  
Red Boiling Springs (699)  
Defeated (774)  
Bethpage (841)  
Oakgrove (888)  
Scottsville Rural (270-618, 270-622)

PUBLIC SERVICE COMMISSION  
OF KENTUCKY  
EFFECTIVE

SEP 01 1999

PURSUANT TO 807 KAR 5011,  
SECTION 9 (1)

BY: Stephan D. Bell  
SECRETARY OF THE COMMISSION

In addition to local calling to all North Central exchanges subscribers in these exchanges will receive local calling to any exchange within the subscriber's county.

**C.3 Local Exchange Rates**

Rates do not include a charge for instrument or other customer premises equipment. Rates for additional services, including installation charges, are shown elsewhere in this Tariff.

	<u>Monthly Rate</u>
1. Residential Service	\$ 11.90
2. Business Service	\$ 18.03

Issue Date: August 1, 1999

Effective Date: September 1, 1999

Issued By:

F. Thomas Rowland  
F. Thomas Rowland, Executive Vice President / General Manager



To: Cingular Wireless  
From: North Central Telephone Cooperative, Inc.  
Date: March 15, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARS5  
DFTDTNXARS5  
GNGVTNXARS5  
HLDLTNXARS5  
LFYTTNXADS1  
OKGVTNXARS5  
PLSHTNXARS5  
RBSPTNXARS5  
WMLDTNXARS5

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).*)

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 HWY. 52 BYPASS EAST  
P.O. Box 70  
Lafayette TN 37083-0070

Phone: 615-888-2151  
www.nctc.com  
www.nctcustors.com

1574 Old Ballatin Road  
P.O. Box 88  
Scottsville NY 42154

Phone: 270-822-7600

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083

Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,



Johnny L. McClanahan  
V.P. Finance & Administrative Services



To: Eloqui Wireless  
From: North Central Telephone Cooperative, Inc.  
Date: April 29, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARS5  
DFTDTNXARS5  
GNGVTNXARS5  
HLDLTNXARS5  
LFYTTNXADS1  
OKGVTNXARS5  
PLSHTNXARS5  
RBSPTNXARS5  
WMLDTNXARS5

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).*

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 Hwy. 52 Bypass East  
P.O. Box 78  
Lafayette TN 37083-0078

Phone: 615-888-2151  
www.nctc.com  
www.nctcstore.com

1674 Old Gallatin Road  
P.O. Box 88  
Scottsville KY 42164

Phone: 270-822-7600

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083


Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,



Johnny L. McClanahan  
V.P. Finance & Administrative Services



To: Sprint PCS  
From: North Central Telephone Cooperative, Inc.  
Date: March 15, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARS5  
DFTDTNXARS5  
GNGVTNXARS5  
HLDLTNXARS5  
LFYTTNXADS1  
OKGVTNXARS5  
PLSHTNXARS5  
RBSPTNXARS5  
WMLDTNXARS5

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).*

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 HWY. 52 BYPASS EAST  
P.O. Box 70  
LAFAYETTE TN 37088-0070

Phone: 615-888-2151  
www.nctc.com  
www.nctcstore.com

1674 Old Gallatin Road  
P.O. Box 88  
SCOTTSDALE NY 42164

Phone: 270-822-7600

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083

Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,

  
Johnny L. McClanahan  
V.P. Finance & Administrative Services



To: AT&T Wireless  
From: North Central Telephone Cooperative, Inc.  
Date: March 15, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARS5  
DFTDTNXARS5  
GNGVTNXARS5  
HLDLTNXARS5  
LFYTTNXADS1  
OKGVTNXARS5  
PLSHTNXARS5  
RBSPTNXARS5  
WMLDTNXARS5

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 HWY. 52 BYPASS EAST  
P.O. Box 70  
LAFAYETTE TN 37088-0070

Phone: 616-888-2151  
www.nctc.com  
www.nctc0010pc.com

1574 Old Gallatin Road  
P.O. Box 98  
Scottsville KY 42164

Phone: 270-622-7500

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083

Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,



Johnny L. McClanahan  
V.P. Finance & Administrative Services



To: T-Mobile  
Attn: Shannon Reilly Kraus  
From: North Central Telephone Cooperative, Inc.  
Date: April 15, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARSS  
DFTDTNXARSS  
GNGVTNXARSS  
HLDLTNXARSS  
LFYTTNXADS1  
OKGVTNXARSS  
PLSHTNXARSS  
RBSPTNXARSS  
WMLDTNXARSS

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 Hwy. 82 Bypass East  
P.O. Box 70  
Lafayette TN 37089-0070

Phone: 615-885-2151  
www.nctc.com  
www.nctcinfo.com

1574 Old Gallatin Road  
P.O. Box 98  
Scottsville KY 42184

Phone: 270-822-7500

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083

Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,



Johnny L. McClanahan  
V.P. Finance & Administrative Services



To: Verizon Wireless  
From: North Central Telephone Cooperative, Inc.  
Date: March 5, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0573
2. The CLLI Codes of our switches are as follows:

BTHPTNXARS5  
DFTDTNXARS5  
GNGVTNXARS5  
HLDLTNXARS5  
LFYTTNXADS1  
OKGVTNXARS5  
PLSHTNXARS5  
RBSPTNXARS5  
WMLDTNXARS5

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).*

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

872 HWY. 52 BYPASS EAST  
P.O. BOX 70  
LAFAYETTE TN 37088-0070

PHONE: 615-888-2151  
WWW.NCTC.COM  
WWW.NCTCOUTSPE.COM

1574 OLD GALLATIN ROAD  
P.O. BOX 88  
SCOTTSDALE KY 42164  
PHONE: 270-822-7500

4. Requests and inquiries should be directed to:

Mr. Johnny McClanahan  
P. O. Box 70  
872 E. Hwy. 52 Bypass  
Lafayette, TN 37083

Telephone number: 615-666-2151  
Fax number: 615-666-6244

5. Business Hours: 8:00-4:30 Central Time Zone

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

Should you have any questions please contact me.

Sincerely,



Johnny L. McClanahan  
V.P. Finance & Administrative Services

RECEIVED

205 MAY 27 PM 2:02

I.R.A. BOOKET ROOM

TDS  
CONCORD  
HUMPHREYS  
TELLICO  
TN TEL

Spartaco



1.18

December 5, 2003

Ms Lisa Paarfusser  
US Cellular  
8410 West Bryn Mawr Ave.  
Chicago, IL 60631-3486

RE: US Cellular correspondence dated November 20, 2003 related to Local  
Number Portability

Dear Ms Paarfusser.

The TDS Telecom subsidiaries marked with an \* on the attached list are in receipt of the above referenced correspondence concerning local number portability. Other TDS Telecom subsidiaries may have received your correspondence as well. This response shall serve for all TDS Telecom operating subsidiaries on the attached list.

TDS Telecom is currently in the process of reviewing your requests as well as recent FCC orders regarding intermodal number portability. Once we have determined a course of action and any associated timeframes, we will communicate further with you.

TDS Telecom reserves its right to seek a waiver of the FCC rules pertaining to local number portability and/or to seek suspension or modification of any number portability requirement from the applicable state Commission, pursuant to Section 251(f) of the Telecommunications Act, on behalf of its qualifying subsidiaries.

All correspondence in regards to this matter for any TDS Telecom subsidiary should be directed to

TDS Telecom  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Lowrance".

Linda Lowrance  
Manager-Interconnection

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

TDS TELECOM Operating Companies  
As of November 1, 2003

Alabama-	Butler Telephone Company, Inc. Oakman Telephone Company, Inc. Peoples Telephone Company
Arizona-	Arizona Telephone Company Southwestern Telephone Company
Arkansas-	Cleveland County Telephone Company, Inc. Decatur Telephone Company, Inc.
California-	Happy Valley Telephone Company* Hornitos Telephone Company Winterhaven Telephone Company
Colorado-	Delta County Tele-Comm, Inc. Strasburg Telephone Company
Florida-	Quincy Telephone Company
Georgia-	Blue Ridge Telephone Company Camden Telephone and Telegraph Company Quincy Telephone Company Nelson-Ball Ground Telephone Company
Idaho-	Potlatch Telephone Company, Inc.
Indiana-	Camden Telephone Company, Inc.* Communications Corporation of Indiana* Communications Corporation of Southern Indiana Home Telephone Company, Inc. S&W Telephone Company, Inc. The Home Telephone Company of Pittsboro, Inc. The Merchants and Farmers Telephone Company Tipton Telephone Company, Inc. Tri-County Telephone Company, Inc *
Kentucky-	Leslie County Telephone Company Lewisport Telephone Company, Inc. Salem Telephone Company
Maine-	Cobbosseecontee Telephone & Telegraph Company Hampden Telephone Company* Hartland and St. Albans Telephone Company Somerset Telephone Company* The Island Telephone Company The West Penobscot Telephone and Telegraph Company Warren Telephone Company
Michigan-	Chatham Telephone Company Communications Corporation of Michigan Island Telephone Company Shuawassee Telephone Company Wolverine Telephone Company

Minnesota-	Arvig Telephone Company Bridge Water Telephone Company Mid-State Telephone Company Winsted Telephone Company
Mississippi-	Calhoun City Telephone Company, Inc. Myrtle Telephone Company Southeast Mississippi Telephone Company
Missouri-	New London Telephone Company* Orchard Farm Telephone Company The Stoutland Telephone Company*
New Hampshire-	Hollis Telephone Company Kearsarge Telephone Company*(Chichester) Merrimack County Telephone Company* Wilton Telephone Company*
New York-	Deposit Telephone Company, Inc Edwards Telephone Company, Inc. Oriskany Falls Telephone Corporation Port Byron Telephone Company Township Telephone Company, Inc. Vernon Telephone Company, Inc.
North Carolina-	Barnardsville Telephone Company Saluda Mountain Telephone Company Service Telephone Company
Ohio-	Arcadia Telephone Company Continental Telephone Company Little Miami Communications Corporation Oakwood Telephone Company The Vanlue Mutual Telephone Company
Oklahoma-	Mid-America Telephone, Inc.* Oklahoma Communication Systems, Inc * Wyandotte Telephone Company*
Oregon-	Asotin Telephone Company* Home Telephone Company, Inc.*
Pennsylvania-	Deposit Telephone Company, Inc. Mahanoy and Mahantango Telephone Company Sugar Valley Telephone Company
South Carolina-	McClellanville Telephone Company, Inc. Norway Telephone Company, Inc. St. Stephen Telephone Company Williston Telephone Company
Tennessee-	Concord Telephone Exchange, Inc. Humphreys County Telephone Company Tellico Telephone Company, Inc.* Tennessee Telephone Company

Vermont-	Ludlow Telephone Company Northfield Telephone Company Perkinsville Telephone Company, Inc.
Virginia-	Amelia Telephone Corporation New Castle Telephone Company Virginia Telephone Company
Washington-	Asotin Telephone Company Lewis River Telephone Company, Inc. McDaniel Telephone Company*
Wisconsin-	Badger Telecom, Inc. Black Earth Telephone Company, Inc.* Bonduel Telephone Company Burlington, Brighton & Wheatland Telephone Company* Central State Telephone Company* Dickeyville Telephone Corporation Eastcoast Telecom, Inc.* Farmers Telephone Company Grantland Telecom, Inc.* Mid-Plains, Inc Midway Telephone Company Mt. Vernon Telephone Company* Riverside Telecom, Inc.* Southeast Telephone Company of Wisconsin, Inc.* Stockbridge & Sherwood Telephone Company* Tenney Telephone Company* The Scandinavia Telephone Company* UTELCO, Inc * Waunakee Telephone Company, Inc.*

\* Companies in receipt of November 20, 2003 correspondence from US Cellular



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

January 16, 2004

Ms. Lisa Paarfusser  
US Cellular  
8410 W Bryn Mawr, Suite 700  
Chicago, IL 60631

Re: Wireless Local Number Portability (WLNP)-Top 100 MSAs, Mid-Plains, WI and Flora-Troy, OR

Dear Ms. Paarfusser:

Yesterday we provided information acknowledging US Cellular's requests for number portability in various operating companies of TDS Telecommunications Corporation, ("TDS TELECOM"). We have been working to refine our implementation schedule based upon carrier request date and switch capabilities. The table below provides the expected dates of implementation for your requests that are in the top 100 MSAs. Unless we hear otherwise, TDS will be proceeding in accordance with the proposed schedule.

OCN	TOP 100 MSA - CLLI's	NPA	NXX	EFFECTIVE DATE
0776	CYTNINXARS0	317	539	3/22/04
0776	NWRSINXARS0	765	723	3/22/04
0830	CLFXINXADS0	765	324	3/15/04
1984	INOLOKXADS1	918	543	N/A
1984	KLVLOKXADS1	918	247	3/8/04
1984	MNDSOKXARS0	918	827	3/8/04
0952	WDLKWIXADS0	262	895	3/1/04
0881	CRPLWIXARS0	608	798	11/24/03

We still do not have an implementation date for the Inola, OK switch. To accommodate number portability, we are replacing this switch. As soon as we have the completion date, we will share it.

I want to pass on completion information on switches beyond the Top 100 MSAs. In particular, US Cellular requested WLNP for the Non-Top 100 switches in Middleton and Cross Plains, WI. Number portability is now active in these switches. CLLI code and NPA-NXX information for these switches appear in the table, below. You may use the Trading Partner Profile information to place orders in these switches.

OCN	NON-TOP 100 MSA - CLLI's	NPA	NXX	EFFECTIVE DATE
0881	MDTNWIXBDS1	608	821,826,827, 828,829,833	11/24/03
0881	CRPLWIXARS0	608	798	11/24/03



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

In addition, in our conversation yesterday, we brought up the issue with Flora-Troy, OR.

TDS TELECOM's regulatory organization has petitioned the Washington PSC for a number portability extension until 6/1/2005 to complete the needed switch replacement. The Asotin, WA switch replacement when completed will provide number portability in the Flora-Troy, OR switch as well.

We would like to request US Cellular withdraw the request for Flora-Troy, OR.

The Flora-Troy exchange of Asotin Telephone company has just 146 local lines, so as you can see the opportunity is very small.

Number portability will become available in Flora-Troy as soon as the switch in Washington state is replaced. There is a current proceeding open in Washington to deal with this issue, and we believe that moving forward with the current Flora-Troy number portability request in Oregon does nothing more than add cost for both companies.

If a withdrawal of this request is not possible, TDS will have no choice but to file a similar petition for extension under 47 U.S.C 251(f)(2) of the Federal Telecommunications Act, with the Oregon PSC. Given the limited number of Oregon customers TDS has, this seems like a reasonable request. We would appreciate your response by 1/23/03. If not, TDS TELECOM will have to file its extension request in Oregon by 2/1/05.

OCN	NON-TOP 100 MSA - CLLIS	NPA	NXX	EFFECTIVE DATE
2404	FLTYORXXRS0	541	828	N/A

I am also providing TDS TELECOM's Trading Partner Profile (TPP) for the operating companies for which we have received a valid request along with the tentative implementation dates. Enclosed you will find a revised TPP that further refines the implementation dates. Also, enclosed for your review and execution is a proposed Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document will be greatly appreciated.

As we move forward in providing this new capability between our organizations I am sure there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (608)664-4800 or e-mail [bob.abrams@tdstelecom.com](mailto:bob.abrams@tdstelecom.com).

Sincerely,

*Robert R. Abrams*

525 Junction Road  
P O Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

February 11, 2004

Ms Lisa Paarfusser  
US Cellular Corporation  
8410 W Bryn Mawr, Suite 700  
Chicago, IL 60631

Re Wireless Local Number Portability (WLNP) Update

Dear Ms Paarfusser:

I enjoyed our last conversation on January 16 regarding US Cellular's requests for number portability in various operating companies of TDS Telecommunications Corporation, ("TDS TELECOM"). As I explained, we are working our implementation schedule based upon carrier request date and switch capabilities. This is an update of that schedule.

The tables below provides the expected dates of implementation for your requests. Unless we hear otherwise, TDS will be proceeding in accordance with the proposed schedule

OCN	TOP 100 MSA - GLLs	NPA	NXX	EFFECTIVE DATE
0881	CRPLWIXARS0	608	798	11/24/03
0952	WDLKWIXADS1	262	895	03/01/2004
1984	KLVLOKXADS1	918	247	03/08/2004
1984	MNDSOKXARS0	918	827	03/08/2004
0830	CLFXINXADS0	765	324	03/15/2004
0776	CYTNINXARS0	317	539	03/22/2004
0776	NWRSINXARS0	765	723	03/22/2004
1984	INOLOKXADS1	918	543	N/A

We still do not have an implementation date for the Inola, OK switch. To accommodate number portability, we are replacing this switch. As soon as we have the completion date, we will share it.

OCN	NON TOP 100 MSA - GLLs	NPA	NXX	EFFECTIVE DATE
0881	CRPLWIXARS0	608	798	11/24/2003
0881	MDTNWIXBDS1	608	821,826,827, 828,829,833	11/24/2003
0830	LNDNINXADS0	765	339	03/15/2004
0830	WNGTINXADS0	765	275	03/15/2004
0776	FLMRINXARSA	765	246	03/22/2004
0776	RCDLINXADS0	765	522	03/22/2004



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

OCN	NON-TOP 100 MSA - CELLS	NPA	NXX	EFFECTIVE DATE
2430	MSRKWAXXRS0	360	983	03/22/2004
2430	SLKMWAXBDS0	360	985	03/22/2004
0952	WTFRWIXADS1	262	514,534	03/29/2004
3320	HLBONHXADS0	603	464	04/05/2004
3320	MLVGNHXADS0	603	544	04/05/2004
0963	ALBYWIXARS0	608	862	04/05/2004
0963	BNVLWIXARS0	608	523	04/05/2004
0963	BWTWWIXARS0	608	966	04/05/2004
0963	JUDAWIXARS0	608	934	04/05/2004
0963	MONRWIXADSA	608	324,325, 328,329	04/05/2004
0963	MNTIWIXARS0	608	938	04/05/2004
0963	SWYNWIXARS0	608	439	04/05/2004
0963	WDFRWIXARS0	608	465	04/05/2004
3320	ANTRNHXARS3	603	588	04/12/2004
3320	HNKRNHXARS2	603	428	04/12/2004
0047	BRFRNHXARS2	603	938	04/12/2004
0047	CNTCNHXADS1	603	746	04/12/2004
0047	STTNNHXARS2	603	927	04/12/2004
0047	WRNRNHXARS2	603	456	04/12/2004
0578	BLPLTNXARS0	423	295	04/19/2004
0578	CKCKTNXARS0	423	261	04/19/2004
0578	ENWDTNXADS1	423	885,887	04/19/2004
0578	NIOTTNXARS0	423	568	04/19/2004
0578	RCVLTNXARS0	423	462	04/19/2004
0578	TLPLTNXADS1	423	253	04/19/2004
2321	TRCTCAXFRS0	530	266	04/26/2004
2321	TRCTCAXFRS0	530	286	04/26/2004
0578	VONRTNXADS1	423	884,792	04/26/2004
0744	BRRWINXARS2	574	652	05/03/2004
0744	CMDNINXADS1	574	686	05/03/2004
0744	DRCKINXARS2	574	859	05/03/2004
0024	ATHNMEXARS2	207	654	05/03/2004
0024	BGLWMEXARS0	207	237	05/03/2004
0024	CRBSMEXARS1	207	235	05/03/2004
0024	CBGRMEXADS0	207	297	05/03/2004
0024	EMLKMEXARS2	207	566	05/03/2004
0024	KGFDMEARS1	207	265	05/03/2004
0024	MRCRMEXARS2	207	587	05/03/2004

525 Junction Road  
P.O. Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

OCN	NON TOP 100 MSA - CLETS	NPA	NPX	EFFECTIVE DATE
0024	SRTNMEXARS1	207	243	05/03/2004
0024	NWVNMEXARS2	207	652	05/03/2004
0024	NRDGMEXARS0	207	634	05/03/2004
0024	NANSMEXADS1	207	635	05/03/2004
0024	NNPRMEXARS2	207	628	05/03/2004
0024	PHLPMEXARS2	207	639	05/03/2004
0024	ROMEMEXARS2	207	397	05/03/2004
0024	SALMMEXARS2	207	678	05/03/2004
0024	SMFDMEXARS2	207	362	05/03/2004
0024	SOLNMEXARS2	207	643	05/03/2004
0024	SRTNMEXARS1	207	246	05/03/2004
0024	STRNMEXARS0	207	684	05/03/2004
0024	WELDMEXARS2	207	585	05/03/2004
0031	WRRNMEXADS1	207	273	05/24/2004
0045	CHCHNHXADS1	603	798	05/24/2004
0045	ANDVNHXARS1	603	735	05/24/2004
0045	BSCWNHXARS1	603	796	05/24/2004
0045	NWLNNHXADS0	603	526	05/24/2004
0045	SLBRNHXARS1	603	648	05/24/2004
0045	MRDNNHXADS1	603	469	05/24/2004
0050	WLTONHXADS0	603	654	05/31/2004
3321	HLLSNHXADS0	603	465	06/07/2004
0917	MTVRWIXARS1	608	832	06/28/2004
0917	VRNAWIXADS1	608	845,848	06/28/2004
0917	NWGLWIXARL0	608	527	06/28/2004
0968	WAUNWIXADS1	608	849	06/28/2004
0856	BHLKWIXADS1	262	539	07/12/2004
0856	WTLDWIXARS0	262	537	07/12/2004
0914	CLEVWIXADS1	920	693	07/12/2004
0914	HWGVWIXARS0	920	565	07/12/2004
0914	VLDRWIXARS0	920	775	07/12/2004
0914	CLNSWIXARS1	920	772	07/12/2004
0914	STNZWIXARS1	920	773	07/12/2004
0011	HRMYMEXARS1	207	683	07/26/2004
0011	HRLDMEXADS1	207	938	07/26/2004
0011	WRPLMEXARS1	207	277	07/26/2004
0034	EXTRMEXARS1	207	379	07/26/2004
0034	STSNMEXARS1	207	296	07/26/2004
0010	ETNAMEXARS1	207	269	08/02/2004

525 Junction Road  
P.O. Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

OCN	NON-TOP 100 MSA - CELLS	NPA	NXX	EFFECTIVE DATE
0010	HMPDMEXADS1	207	862	08/02/2004
0034	CORNEXARS0	207	278	08/02/2004
0875	DCVLWIXARS0	608	568	08/09/2004
0880	BETWWIXARS0	608	794	08/09/2004
0880	CSVLWIXARS0	608	725	08/09/2004
0880	LNCXWIXADS1	608	723	08/09/2004
0880	POTSWIXARS0	608	763	08/09/2004
0943	JHCKWIXADS1	920	699	08/09/2004
0943	RSVLWIXADS1	920	927	08/09/2004
2010	BRMDOKXARS0	580	638	08/16/2004
2010	FSTWOKXARS0	580	777	08/16/2004
2010	HNPNOXARS0	580	868	08/16/2004
2010	STNWOKXADS0	580	265	08/16/2004
0058	LDLWVTXADS0	802	228	08/23/2004
0058	PRVLVTXARS1	802	226	08/23/2004
2034	WYNDOKXBDS0	918	678	08/26/2004
0859	JNCYWIXADS0	715	457	09/13/2004
0859	RHFDWIAARS0	715	591	09/13/2004
0859	NCDHWIXADS2	608	565	09/13/2004
0859	PTSVWIXARS1	715	884	09/13/2004
0859	VSPRWIXARS1	715	569	09/13/2004
0859	LNDXWIXARS1	715	676	09/13/2004
0859	ABDLWIXARS0	715	652	09/13/2004
0954	TSMLWIXADS0	920	776	09/13/2004
0954	SHWDWIXADSA	920	989	09/20/2004
0954	STBRWIXARS0	920	439	09/20/2004
0253	HTSPVAXADS1	540	839	09/27/2004
1984	ADAROKXADS0	918	785	N/A
1984	ELGNOKXARS1	580	492	N/A
1984	FLTCOKXARS1	580	549	N/A
1928	NWLNMOXADSA	573	985	N/A
1951	ELRGMOXARS0	417	426	N/A
1951	STLDMOXADS0	417	286	N/A
2377	CNDNORXBDS1	541	384	N/A
2404	FLTYORXXRS0	541	828	N/A
0849	BLERWIXADS0	608	767	N/A
0930	BGLYWIXARS0	608	996	N/A
0930	BLTNWIXARS0	608	994	N/A
0930	FNMRWIXADSA	608	822	N/A

525 Junction Road  
P.O. Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

OCN	NON-TOP 100 MSA - CLEIS	NPA	NPX	EFFECTIVE DATE
0930	MTHPWIXARS0	608	988	N/A
0930	WDMNWIXARL0	608	533	N/A
0945	IOLAWIXADS2	715	445	N/A
0945	SCNDWIXARL0	715	467	N/A
0958	ALMAWIXADS0	608	685	N/A

Several of the switches in non-Top 100 MSAs will also be replaced to accommodate your portability requests. We are working toward implementation dates for these older switches, and will provide you our dates as soon as we have scheduled them.

I am enclosing TDS TELECOM's updated Trading Partner Profile (TPP) reflecting all of the operating companies for which we have received your valid request

Also, enclosed for your review and execution is TDS TELECOM's Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document is greatly appreciated.

I am always available to answer your questions and follow up on issues TDS TELECOM must resolve. Please direct these matters to my attention at telephone (608)664-4800 or e-mail [bob.abrams@tdstelecom.com](mailto:bob.abrams@tdstelecom.com).

Sincerely,

Manager, Carrier Relations  
TDS TELECOM

525 Junction Road  
P.O. Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



December 5, 2003

Ms. Suzy Nieman  
AT&T Wireless Services  
7277 164<sup>th</sup> Ave NE  
Redmond, WA 98052

Re: AT&T Wireless Correspondence dated November 21, 2003 related to Local  
Number Portability

Dear Ms. Nieman.

The TDS Telecom subsidiaries marked with an \* on the attached list are in receipt of the above referenced correspondence concerning local number portability. Other TDS Telecom subsidiaries may have received your correspondence as well. This response shall serve for all TDS Telecom operating subsidiaries on the attached list

TDS Telecom does not consider AT&T Wireless's letters, in their present form, to be a "bona fide" requests for local number portability. The letters request that TDS Telecom complete the enclosed form and returned it to you by December 4, 2003, however, no such form was included with the letters. In addition, the market listing enclosed with the letters does not provide sufficient information to enable TDS Telecom to determine the specific switches for which AT&T Wireless is seeking LNP deployment. The TDS Telecom subsidiaries will consider your request a BFR upon receipt of supplemental information such as rate center, switch CLLI code or NPA-NXX to further identify the discrete geographic locations for which you request LNP deployment.

All correspondence in regards to this matter or "bona fide requests" for local number portability for any TDS TELECOM subsidiary should be directed to.

TDS TELECOM  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

All such requests should identify the particular TDS Telecom operating company and specifically address the information indicated above. Once AT&T Wireless presents the TDS Telecom subsidiaries with a true BFR, we will respond to such a request and discuss appropriate next steps.

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

Ms. Suzy Nieman  
December 5, 2003  
Page 2

TDS Telecom reserves its right, pursuant to Section 251(f) of the Telecommunications Act, to seek suspension and/or modification of any number portability requirement on behalf of its qualifying subsidiaries.

I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Lowrance", with a long, sweeping horizontal flourish extending to the right.

Linda Lowrance  
Manager-Interconnection

Attachment

TDS TELECOM Operating Companies  
As of November 1, 2003

Alabama-	Butler Telephone Company, Inc. Oakman Telephone Company, Inc. Peoples Telephone Company
Arizona-	Arizona Telephone Company Southwestern Telephone Company
Arkansas-	Cleveland County Telephone Company, Inc. Decatur Telephone Company, Inc.*
California-	Happy Valley Telephone Company Hornitos Telephone Company Winterhaven Telephone Company*
Colorado-	Delta County Tele-Comm, Inc * Strasburg Telephone Company
Florida-	Quincy Telephone Company
Georgia-	Blue Ridge Telephone Company Camden Telephone and Telegraph Company Quincy Telephone Company Nelson-Ball Ground Telephone Company
Idaho-	Potlatch Telephone Company, Inc.
Indiana-	Camden Telephone Company, Inc Communications Corporation of Indiana Communications Corporation of Southern Indiana Home Telephone Company, Inc. S&W Telephone Company, Inc. The Home Telephone Company of Pittsboro, Inc. The Merchants and Farmers Telephone Company Tipton Telephone Company, Inc Tri-County Telephone Company, Inc.
Kentucky-	Leslie County Telephone Company Lewisport Telephone Company, Inc. Salem Telephone Company
Maine-	Cobbosseecontee Telephone & Telegraph Company Hampden Telephone Company Hartland and St. Albans Telephone Company Somerset Telephone Company The Island Telephone Company The West Penobscot Telephone and Telegraph Company Warren Telephone Company
Michigan-	Chatham Telephone Company Communications Corporation of Michigan Island Telephone Company Shiawassee Telephone Company Wolverine Telephone Company*

Minnesota-	Arvig Telephone Company Bridge Water Telephone Company Mid-State Telephone Company Winsted Telephone Company
Mississippi-	Calhoun City Telephone Company, Inc. Myrtle Telephone Company Southeast Mississippi Telephone Company
Missouri-	New London Telephone Company Orchard Farm Telephone Company The Stoutland Telephone Company
New Hampshire-	Hollis Telephone Company Kearsarge Telephone Company Merrimack County Telephone Company* Wilton Telephone Company
New York-	Deposit Telephone Company, Inc. Edwards Telephone Company, Inc. Oriskany Falls Telephone Corporation Port Byron Telephone Company Township Telephone Company, Inc. Vernon Telephone Company, Inc.
North Carolina-	Barnardsville Telephone Company Saluda Mountain Telephone Company Service Telephone Company
Ohio-	Arcadia Telephone Company Continental Telephone Company Little Miami Communications Corporation Oakwood Telephone Company The Vanlue Mutual Telephone Company
Oklahoma-	Mid-America Telephone, Inc. Oklahoma Communication Systems, Inc * Wyandotte Telephone Company
Oregon-	Asotin Telephone Company Home Telephone Company, Inc.
Pennsylvania-	Deposit Telephone Company, Inc. Mahanoy and Mahantango Telephone Company Sugar Valley Telephone Company
South Carolina-	McClellanville Telephone Company, Inc. Norway Telephone Company, Inc St. Stephen Telephone Company Williston Telephone Company
Tennessee-	Concord Telephone Exchange, Inc Humphreys County Telephone Company Tellico Telephone Company, Inc. Tennessee Telephone Company

Vermont-	Ludlow Telephone Company Northfield Telephone Company Perkinsville Telephone Company, Inc.
Virginia-	Amelia Telephone Corporation New Castle Telephone Company Virginia Telephone Company
Washington-	Asotin Telephone Company Lewis River Telephone Company, Inc. McDaniel Telephone Company*
Wisconsin-	Badger Telecom, Inc. Black Earth Telephone Company, Inc. Bonduel Telephone Company Burlington, Brighton & Wheatland Telephone Company Central State Telephone Company Dickeyville Telephone Corporation Eastcoast Telecom, Inc. Farmers Telephone Company Grantland Telecom, Inc. Mid-Plains, Inc. Midway Telephone Company Mt. Vernon Telephone Company* Riverside Telecom, Inc. Southeast Telephone Company of Wisconsin, Inc. Stockbridge & Sherwood Telephone Company Tenney Telephone Company The Scandinavia Telephone Company UTELCO, Inc Waunakee Telephone Company, Inc.*

\* Companies in receipt of November 21, 2003 correspondence from AT&T Wireless Services

**Lowrance, Linda N.**

---

**From:** Hicks, Mike  
**Sent:** Friday, January 16, 2004 3:28 PM  
**To:** 'suzanne nieman@attws.com'  
**Cc:** Reilly, Louis; Abrams, Bob R.; Lowrance, Linda N.; Newton-Kellogg, Mary C.; Pauk, Jean M.; Reed, Mike C.; Mottern, Bruce H.; Handley, Jeff; McCabe, Thomas M.; Meade, Jim; Zeiler, John; Proctor, Mitchell R.; Long, Gail  
**Subject:** RE: WNP Requests ATTWS - TDS Top 100 MSAs

Dear Ms. Neiman,

Since the correspondence below was provided, TDS has been working to better define its implementation schedules for WNP. Please review the attached files and notify me if you have any concerns or questions in regards to our plans.

Sincerely,  
Michael Hicks



LNP Top 100 MSA  
Letter to AT&T.



AT&T Wireless Trading  
Partner



TDS - Cingular  
Wireless Trading

-----Original Message-----

**From:** Hicks, Mike  
**Sent:** Friday, December 19, 2003 12:27 PM  
**To:** 'suzanne nieman@attws.com'  
**Cc:** Reilly, Louis, Abrams, Bob R., Lowrance, Linda N., Newton-Kellogg, Mary C.  
**Subject:** WNP Requests

Dear Ms. Nieman,

My name is Michael Hicks and I am the Carrier Relations Manager for TDS TELECOM's activities with AT&T Wireless. We are in receipt of requests from AT&T Wireless for Wireless Local Number Portability at several of our operating companies. In order to move forward with your request we need to complete and exchange certain information. Attached are TDS TELECOM's proposed Wireless Local Number Portability Operating Agreement and Trading Partner Profile. Since the holidays are upon us I understand it most likely will be after the first of the year before we can expect to finalize these documents. However, your assistance in the timely completion of this information will be greatly appreciated.

Sincerely,  
Michael Hicks  
(865)671-4505

<< File: WNP Letter.doc >> << File: AT&T Wireless - TDS Draft Operating Agreement.doc >>  
<< File: AT&T Wireless Trading Partner Profile.doc >>



Michael Hicks  
Manager Carrier Relations  
(865)671-4505  
mike.hicks@tdstelecom.com

January 16, 2004

Ms. Suzy Nieman  
Manager Carrier Relations  
AT&T Wireless Services  
7277 164<sup>th</sup> Avenue NE  
Redmond, WA 98052

Re: Wireless Local Number Portability (WLNP) - Top 100 MSAs

Dear Ms. Nieman

On December 19, 2003, you were provided information acknowledging AT&T Wireless's requests for number portability in various operating companies of TDS Telecommunications Corporation ("TDS TELECOM"). Since that time, we have been working to refine our implementation schedule based upon carrier request date and switch capabilities. The table at the bottom of this correspondence provides the dates of implementation for your requests that are in the top 100 MSAs. Unless we hear otherwise, TDS TELECOM will be proceeding in accordance with the proposed schedule below.

Also, I earlier provided TDS Telecom's Trading Partner Profile (TPP) for the operating companies for which we have received a valid request along with the tentative implementation dates. Enclosed you will find a revised TPP that further refines the implementation dates. Also, enclosed for your review and execution is a proposed Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document will be greatly appreciated.

OCN	CELL	NPA	NXX	EFFECTIVE DATE
0738	FSTRMIXIRS1	989	795	03/15/2004
	MGTHMIXIDS1	989	871	03/15/2004
	MNGRMIXJRS0	989	659	03/15/2004

As we move forward in providing this new capability between our organizations I am sure there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (865)671-4505 or e-mail [mike.hicks@tdstelecom.com](mailto:mike.hicks@tdstelecom.com).

Sincerely,  
*Michael E. Hicks*



Michael Hicks  
Manager Carrier Relations  
(865)671-4505  
[mike.hicks@tdstelecom.com](mailto:mike.hicks@tdstelecom.com)

December 19, 2003

Ms. Susan Riley  
Sr. Interconnection Manager  
Cingular Wireless  
5565 Glenridge Connector, Suite 1520  
Atlanta, GA 30342

Re: Wireless Local Number Portability

Dear Ms. Riley:

In order to move forward in handling CINGULAR Wireless's request for Wireless Number Portability (WNP) at various TDS Telecom operating affiliates it is necessary for us to exchange certain information. Enclosed you will find TDS TELECOM's Trading Partner Profile (TPP) for the operating companies for which we have received a valid request. Please either populate the TPP with your information or provide a copy of CINGULAR Wireless's TPP.

Also, enclosed for your review and execution is a proposed Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document will be greatly appreciated.

Finally, I must remind you that TDS TELECOM currently is not LNP capable in all the locations requested by CINGULAR Wireless. We are diligently working toward meeting the implementation dates specified in FCC Orders. However, prior to issuing an order for porting at any of our affiliates I recommend that CINGULAR Wireless verify in the Local Exchange Routing Guide (LERG) whether or not porting has been activated at a specific NPA/NXX.

As we move forward in providing this new capability between our organizations I am sure there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (865)671-4505 or e-mail [mike.hicks@tdstelecom.com](mailto:mike.hicks@tdstelecom.com).

Sincerely,

*Michael E. Hicks*



December 10, 2003

Ms. Susan Riley  
Cingular Wireless  
5565 Glenridge Connector  
Suite 1520  
Atlanta, GA 30342

Re: Cingular Wireless correspondence dated December 2, 2003  
related to Local Number Portability

Dear Ms. Riley:

The TDS Telecom subsidiaries Peoples Telephone Company and Tennessee Telephone Company are in receipt of the above referenced correspondence concerning local number portability. Other TDS Telecom subsidiaries may have received your correspondence as well. This response shall serve for all TDS Telecom operating subsidiaries.

TDS Telecom is currently in the process of reviewing your requests as well as recent FCC Orders regarding intermodal number portability. Once we have determined a course of action and any associated timeframes, we will communicate further with you.

TDS Telecom reserves its right to seek a waiver of the FCC rules pertaining to local number portability and/or to seek suspension or modification of any number portability requirement from the applicable state Commission pursuant to Section 251(f) of the Telecommunications Act, on behalf of its qualifying subsidiaries.

All correspondence in regards to this matter for any TDS Telecom subsidiary should be directed to

TDS Telecom  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Lowrance".

Linda Lowrance  
Manager- Interconnection

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

**Lowrance, Linda N.**

---

**From:** Hicks, Mike  
**Sent:** Friday, January 16, 2004 3 33 PM  
**To:** 'susan.riley@cingular.com'  
**Cc:** Lowrance, Linda N.; Reilly, Louis; Abrams, Bob R.; Newton-Kellogg, Mary C.; Pauk, Jean M.; Reed, Mike C.; Mottern, Bruce H.; Handley, Jeff; McCabe, Thomas M.; Meade, Jim; Zeiler, John; Proctor, Mitchell R.; Long, Gail  
**Subject:** RE: Cingular WNP Requests to TDS TELECOM Top 100 MSAs

Dear Ms. Riley,

Since the correspondence below was provided, TDS has been working to better define its implementation schedules for WNP. Please review the attached files and notify me if you have any concerns or questions in regards to our plans.

Sincerely,  
Michael Hicks



LNP Top 100 MSA  
Letter to Cingular



Cingular - TDS Draft  
Operating Agreement



TDS - Cingular  
Wireless Trading  
Partner Profile

-----Original Message-----

**From:** Hicks, Mike  
**Sent:** Friday, December 19, 2003 2 42 PM  
**To:** 'susan.riley@cingular.com'  
**Cc:** Lowrance, Linda N.; Reilly, Louis; Abrams, Bob R.; Newton-Kellogg, Mary C.  
**Subject:** WNP Requests to TDS TELECOM

Dear Ms. Riley,

My name is Michael Hicks and I am the Carrier Relations Manager for TDS TELECOM's activities with Cingular Wireless. We are in receipt of requests from Cingular Wireless for Wireless Local Number Portability at several of our operating companies. In order to move forward with your request we need to complete and exchange certain information. Attached are TDS TELECOM's proposed Wireless Local Number Portability Operating Agreement and Trading Partner Profile. Since the holidays are upon us I understand it most likely will be after the first of the year before we can expect to finalize these documents. However, your assistance in the timely completion of this information will be greatly appreciated.

Sincerely,  
Michael Hicks  
(865)671-4505

<< File: WNP Letter to Cingular.doc >> << File: Cingular - TDS Draft Operating Agreement.doc >>  
>> << File: TDS - Cingular Wireless Trading Partner Profile.doc >>



Michael Hicks  
Manager Carrier Relations  
(865)671-4505  
mike.hicks@tdstelecom.com

January 16, 2004

Ms. Susan Riley  
Sr. Interconnection Manager  
Cingular Wireless  
5565 Glenridge Connector, Suite 1520  
Atlanta, GA 30342

Re: Wireless Local Number Portability (WLNP) - Top 100 MSAs

Dear Ms. Riley:

On December 19, 2003, you were provided information acknowledging Cingular's requests for number portability in various operating companies of TDS Telecommunications Corporation ("TDS TELECOM"). Since that time, we have been working to refine our implementation schedule based upon carrier request date and switch capabilities. The table at the bottom of this correspondence provides the dates of implementation for your requests that are in the top 100 MSAs. Unless we hear otherwise, TDS TELECOM will be proceeding in accordance with the proposed schedule below.

Also, I earlier provided TDS Telecom's Trading Partner Profile (TPP) for the operating companies for which we have received a valid request along with the tentative implementation dates. Enclosed you will find a revised TPP that further refines the implementation dates. Also, enclosed for your review and execution is a proposed Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document will be greatly appreciated.

OCN	GLL	NPA	NXX	EFFECTIVE DATE
0375	BGCPGAXARS1	706	268	11-24-03
	NLSNGAXADS1	770	735,737	11-24-03
	MRHLGAXARS1	770	893,894	11-24-03
0575	LVRGTNXADS2	615	213,287, 501,641, 793	11-24-03
	MTJLTNXADS2	615	754, 758, 773	11-24-03
	HCRDTNXADS1	865	922, 925	11-24-03

As we move forward in providing this new capability between our organizations I am sure there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (865)671-4505 or e-mail [mike.hicks@tdstelecom.com](mailto:mike.hicks@tdstelecom.com).

Sincerely,  
*Michael E. Hicks*



March 31, 2003

Ms. Shannon Reilly  
Corporate Counsel- Regulatory Affairs  
T-Mobile USA, Inc.  
12920 SE 38<sup>th</sup> Street  
Bellevue, WA 98006

Re: T-Mobile Correspondence dated February 21, 2003 related to Local Number Portability

Dear Ms. Reilly:

The TDS TELECOM subsidiaries of Blue Ridge Telephone Company (GA), Edwards Telephone Company (NY), Camden Telephone Company (IN) and Camden Telephone and Telegraph (GA) have received the above referenced correspondence concerning local number portability. Other TDS TELECOM subsidiaries may have received your correspondence as well. This response shall serve for all TDS TELECOM operating subsidiaries on the attached list.

TDS TELECOM does not consider T-Mobile's blanket letter and attached form to be a "bona fide request" for local number portability. To be considered a "bona fide request" for number portability certain specific information is required such as switch location, CLLI code, and requested implementation dates. In addition, none of the four companies noted above is located within the top 100 MSAs identified by the Federal Communications Commission for deployment of local number portability by wireless companies.

All correspondence in regards to this matter or "bona fide requests" for local number portability for any TDS TELECOM subsidiary should be directed to:

TDS TELECOM  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

All such requests should identify the particular TDS TELECOM operating company and specifically address the information indicated above. TDS TELECOM reserves its right, pursuant to Section 251(f) of the Telecommunications Act, to seek suspension and/or modification of any number portability requirement on behalf of its qualifying subsidiaries.

I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Lowrance".

Linda Lowrance  
Manager-Interconnection

Attachment

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

TDS TELECOM Operating Companies  
As of March 31, 2003

Alabama-	Butler Telephone Company, Inc. Oakman Telephone Company, Inc. Peoples Telephone Company
Arizona-	Arizona Telephone Company Southwestern Telephone Company
Arkansas-	Cleveland County Telephone Company, Inc. Decatur Telephone Company, Inc.
California-	Happy Valley Telephone Company Hornitos Telephone Company Winterhaven Telephone Company
Colorado-	Delta County Tele-Comm, Inc Strasburg Telephone Company
Florida-	Quincy Telephone Company
Georgia-	Blue Ridge Telephone Company Camden Telephone and Telegraph Company Quincy Telephone Company Nelson-Ball Ground Telephone Company
Idaho-	Potlatch Telephone Company, Inc.
Indiana-	Camden Telephone Company, Inc. Communications Corporation of Indiana Communications Corporation of Southern Indiana Home Telephone Company, Inc. S&W Telephone Company, Inc. The Home Telephone Company of Pittsboro, Inc. The Merchants and Farmers Telephone Company Tipton Telephone Company, Inc. Tri-County Telephone Company, Inc.
Kentucky-	Leslie County Telephone Company Lewisport Telephone Company, Inc. Salem Telephone Company
Maine-	Cobbosseecontee Telephone & Telegraph Company Hampden Telephone Company Hartland and St Albans Telephone Company Somerset Telephone Company The Island Telephone Company The West Penobscot Telephone and Telegraph Company Warren Telephone Company
Michigan-	Chatham Telephone Company Communications Corporation of Michigan Island Telephone Company Shiawassee Telephone Company Wolverme Telephone Company

Minnesota-	Arvig Telephone Company Bridge Water Telephone Company Mid-State Telephone Company Winsted Telephone Company
Mississippi-	Calhoun City Telephone Company, Inc. Myrtle Telephone Company Southeast Mississippi Telephone Company
Missouri-	New London Telephone Company Orchard Farm Telephone Company The Stoutland Telephone Company
New Hampshire-	Hollis Telephone Company Kearsarge Telephone Company Merrimack County Telephone Company Wilton Telephone Company
New York-	Deposit Telephone Company, Inc. Edwards Telephone Company, Inc. Oriskany Falls Telephone Corporation Port Byron Telephone Company Township Telephone Company, Inc. Vernon Telephone Company, Inc.
North Carolina-	Barnardsville Telephone Company Saluda Mountain Telephone Company Service Telephone Company
Ohio-	Arcadia Telephone Company Continental Telephone Company Little Miami Communications Corporation Oakwood Telephone Company The Vanlue Mutual Telephone Company
Oklahoma-	Mid-America Telephone, Inc Oklahoma Communication Systems, Inc. Wyandotte Telephone Company
Oregon-	Asotin Telephone Company Home Telephone Company, Inc.
Pennsylvania-	Deposit Telephone Company, Inc. Mahanoy and Mahantango Telephone Company Sugar Valley Telephone Company
South Carolina-	McClellanville Telephone Company, Inc. Norway Telephone Company, Inc. St. Stephen Telephone Company Williston Telephone Company
Tennessee-	Concord Telephone Exchange, Inc. Humphreys County Telephone Company Tellico Telephone Company, Inc. Tennessee Telephone Company

Vermont-	Ludlow Telephone Company Northfield Telephone Company Perkinsville Telephone Company, Inc.
Virginia-	Amelia Telephone Corporation New Castle Telephone Company Virginia Telephone Company
Washington-	Asotin Telephone Company Lewis River Telephone Company, Inc. McDaniel Telephone Company
Wisconsin-	Badger Telecom, Inc. Black Earth Telephone Company, Inc. Bonduel Telephone Company Burlington, Brighton & Wheatland Telephone Company Central State Telephone Company Dickeyville Telephone Corporation Eastcoast Telecom, Inc Farmers Telephone Company Grantland Telecom, Inc. Mid-Plains, Inc. Midway Telephone Company Mt Vernon Telephone Company Riverside Telecom, Inc. Southeast Telephone Company of Wisconsin, Inc. Stockbridge & Sherwood Telephone Company Tenney Telephone Company The Scandinavia Telephone Company UTELCO, Inc. Waunakee Telephone Company, Inc.



August 15, 2003

Ms. Shannon Reilly  
Corporate Counsel, Regulatory Affairs  
T-Mobile USA, Inc.  
12920 SE 38th Street  
Bellevue, Washington 98006

**Re: T-Mobile Correspondence of August 4, 2003 related to Wireless Local  
Number Portability Operations Agreement**

Dear Ms. Reilly:

TDS TELECOM has received T-Mobile's letter of August 4, 2003 and its attached Local Number Portability Operations Agreement ("LNP Agreement"). We are surprised to receive this correspondence, since as we indicated in our most recent letter to you, T-Mobile has yet to submit a "bona fide request" that would initiate the LNP process. As a consequence, we cannot be in a position to even discuss an LNP agreement.

To review the facts: In a letter dated February 21, 2003, T-Mobile sent to some of the TDS TELECOM subsidiaries what it referred to as a "Bona Fide Request Form" ("BFR Form") for local number portability. The attached form was nothing more than a listing of every Metropolitan Statistical Area ("MSA") in the country with blank spaces indicating that the TDS subsidiaries were expected to complete your form for you and supply certain information.

On March 31, 2003, we sent you a letter stating that TDS did not consider T-Mobile's blanket letter and attached form to be a bona fide request for number portability as defined in the Federal Communication Commission's rules. That letter stated (1) that T-Mobile's form failed to contain the information necessary to be considered a bona fide request and (2) that the TDS subsidiaries that received the form are not located within the top 100 MSAs identified by the Commission for deployment of local number portability by wireless companies pursuant to the November 24, 2003 deadline. We never received a response to this letter stating our position that T-Mobile had yet to submit a BFR. Instead, on August 4, 2003, T-Mobile sent the LNP Agreement with a request to enter a contract for local number portability.

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

Ms. Shannon Reilly  
August 15, 2003  
Page 2

To reiterate our position, TDS subsidiaries will consider a BFR for number portability. However, T-Mobile's February letter and attached form was wholly inadequate because it failed to (1) specifically identify the local exchange carrier to whom the porting request was directed, (2) specifically identify the discrete geographic areas in which T-Mobile plans to port numbers served by TDS subsidiaries, or (3) name a realistic date by which T-Mobile reasonably expects to be able to receive ported numbers and meet customer requests for number portability.

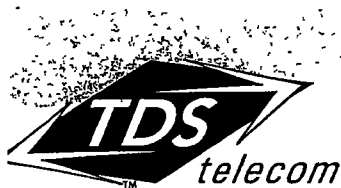
Once T-Mobile provides the TDS subsidiaries with a true BFR, we will respond to such a request and discuss appropriate next steps. Please note that TDS TELECOM reserves the right, pursuant to Section 251(f) of the Communications Act, to seek suspension and/or modification of any number portability requirement on behalf of its qualifying subsidiaries.

Please direct any further correspondence or bona fide requests to the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Lowrance".

Linda Lowrance  
Manager-Interconnection



June 6, 2003

Ms. Fawn Romig  
Sprint PCS  
6580 Sprint Parkway  
Mailstop: KSOPHW0516-5B360  
Overland Park, KS 66251

Re: Sprint PCS correspondence dated May 16, 2003 related to Local Number Portability

Dear Ms. Romig:

The TDS Telecom subsidiaries marked with an \* on the attached list are in receipt of the above referenced correspondence concerning local number portability. Other TDS Telecom subsidiaries may have received your correspondence as well. This response shall serve for all TDS Telecom operating subsidiaries on the attached list.

Under the current Federal Communication Commission rules, TDS Telecom is only required to support number portability within six months of receipt of a specific request by another telecommunications carrier which operates or plans to operate in TDS Telecom's local service area, or rate center (service provider portability). TDS Telecom is not required to support geographic number portability that would allow numbers to be ported outside the existing rate center boundaries.

Based on preliminary review of data in the LERG, with limited exceptions (St Mary's, GA, Henniker, NH and Johnson Creek, WI), it appears that Sprint PCS does not currently operate within the TDS Telecom rate centers identified in your correspondence.

It is unclear from your correspondence whether Sprint PCS in fact has plans to establish a presence in the remaining rate centers thereby making a request for service provider number portability appropriate. TDS Telecom hereby requests that Sprint PCS provide additional information regarding its plans to begin operations within any TDS Telecom rate centers, including the anticipated date such operations will begin so that we can determine whether or not LNP is required at this time.

TDS Telecom reserves its right to seek a waiver of the FCC rules pertaining to local number portability and/or to seek suspension or modification of any number portability requirement from the applicable state Commission, pursuant to Section 251(f) of the Telecommunications Act, on behalf of its qualifying subsidiaries.

All correspondence in regards to this matter for any TDS Telecom subsidiary should be directed to:

TDS Telecom  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

PO BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

Ms. Fawn Romig

June 6, 2003

Page 2

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I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Lowrance".

Linda Lowrance  
Manager-Interconnection

Attachments

TDS TELECOM Operating Companies  
As of May 31, 2003

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Alabama-	Butler Telephone Company, Inc. Oakman Telephone Company, Inc. Peoples Telephone Company
Arizona-	Arizona Telephone Company Southwestern Telephone Company
Arkansas-	Cleveland County Telephone Company, Inc.* Decatur Telephone Company, Inc.
California-	Happy Valley Telephone Company Hornitos Telephone Company Winterhaven Telephone Company*
Colorado-	Delta County Tele-Comm, Inc. Strasburg Telephone Company
Florida-	Quincy Telephone Company*
Georgia-	Blue Ridge Telephone Company Camden Telephone and Telegraph Company* Quincy Telephone Company Nelson-Ball Ground Telephone Company
Idaho-	Potlatch Telephone Company, Inc.
Indiana-	Camden Telephone Company, Inc.* Communications Corporation of Indiana* Communications Corporation of Southern Indiana* Home Telephone Company, Inc.* S&W Telephone Company, Inc. The Home Telephone Company of Pittsboro, Inc.* The Merchants and Farmers Telephone Company* Tipton Telephone Company, Inc. Tri-County Telephone Company, Inc.
Kentucky-	Leslie County Telephone Company Lewisport Telephone Company, Inc.* Salem Telephone Company
Maine-	Cobbosseecontee Telephone & Telegraph Company Hampden Telephone Company Hartland and St. Albans Telephone Company Somerset Telephone Company The Island Telephone Company The West Penobscot Telephone and Telegraph Company Warren Telephone Company
Michigan-	Chatham Telephone Company Communications Corporation of Michigan* Island Telephone Company Shiawassee Telephone Company* Wolverine Telephone Company*

Minnesota- Arvig Telephone Company

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Bridge Water Telephone Company\*  
Mid-State Telephone Company\*  
Winsted Telephone Company\*

Mississippi- Calhoun City Telephone Company, Inc.  
Myrtle Telephone Company  
Southeast Mississippi Telephone Company

Missouri- New London Telephone Company\*  
Orchard Farm Telephone Company  
The Stoutland Telephone Company

New Hampshire- Hollis Telephone Company  
Kearsarge Telephone Company\*  
Merrimack County Telephone Company\*  
Wilton Telephone Company\*

New York- Deposit Telephone Company, Inc.\*  
Edwards Telephone Company, Inc.  
Oriskany Falls Telephone Corporation  
Port Byron Telephone Company  
Township Telephone Company, Inc.  
Vernon Telephone Company, Inc.

North Carolina- Barnardsville Telephone Company  
Saluda Mountain Telephone Company  
Service Telephone Company

Ohio- Arcadia Telephone Company\*  
Continental Telephone Company\*  
Little Miami Communications Corporation\*  
Oakwood Telephone Company\*  
The Vanlue Mutual Telephone Company\*

Oklahoma- Mid-America Telephone, Inc.  
Oklahoma Communication Systems, Inc.\*  
Wyandotte Telephone Company

Oregon- Asotin Telephone Company  
Home Telephone Company, Inc.

Pennsylvania- Deposit Telephone Company, Inc.  
Mahanoy and Mahantango Telephone Company  
Sugar Valley Telephone Company

South Carolina- McClellanville Telephone Company, Inc.  
Norway Telephone Company, Inc.  
St. Stephen Telephone Company  
Williston Telephone Company\*

Tennessee- Concord Telephone Exchange, Inc.  
Humphreys County Telephone Company  
Tellico Telephone Company, Inc.  
Tennessee Telephone Company\*

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Vermont- Ludlow Telephone Company  
Northfield Telephone Company  
Perkinsville Telephone Company, Inc.

Virginia- Amelia Telephone Corporation\*  
New Castle Telephone Company  
Virginia Telephone Company

Washington-Asotin Telephone Company\*  
Lewis River Telephone Company, Inc.\*  
McDaniel Telephone Company

Wisconsin-Badger Telecom, Inc.  
Black Earth Telephone Company, Inc.  
Bonduel Telephone Company  
Burlington, Brighton & Wheatland Telephone Company\*  
Central State Telephone Company\*  
Dickeyville Telephone Corporation  
Eastcoast Telecom, Inc.\*  
Farmers Telephone Company  
Grantland Telecom, Inc.  
Mid-Plains, Inc.  
Midway Telephone Company  
Mt. Vernon Telephone Company\*  
Riverside Telecom, Inc.\*  
Southeast Telephone Company of Wisconsin, Inc.  
Stockbridge & Sherwood Telephone Company\*  
Tenney Telephone Company\*  
The Scandinavia Telephone Company  
UTELCO, Inc.\*  
Waunakee Telephone Company, Inc.\*

\* Companies in receipt of May 16, 2003 correspondence from Sprint PCS



July 23, 2003

Mr. Jack Weyforth  
Sprint PCS  
6450 Sprint Parkway  
Mailstop: KSOPHN0212-2A411  
Overland Park, KS 66251

Re: Sprint PCS correspondence dated May 16, 2003 and July 14, 2003 related to Local Number Portability

Dear Mr. Weyforth:

As indicated in my letter dated June 6, 2003 to Ms. Fawn Romig of Sprint PCS, the TDS Telecom subsidiaries marked with an \* on the attached list are in receipt of the above referenced correspondence concerning local number portability. Other TDS Telecom subsidiaries may have received your correspondence as well. This response shall serve for all TDS Telecom operating subsidiaries on the attached list.

Under the current Federal Communication Commission rules, TDS Telecom is only required to support number portability within six months of receipt of a specific request by another telecommunications carrier which operates or plans to operate in TDS Telecom's local service area, or rate center (service provider portability). TDS Telecom is not required to support geographic number portability that would allow numbers to be ported outside the existing rate center boundaries.

Based on preliminary review of data in the LERG, with limited exceptions (St Mary's, GA, Henniker, NH and Johnson Creek, WI), it appears that Sprint PCS does not currently operate within the TDS Telecom rate centers identified in your correspondence

It was unclear from the initial correspondence whether Sprint PCS in fact has plans to establish a presence in the remaining rate centers thereby making a request for service provider number portability appropriate at this time. TDS Telecom hereby reiterates its request that Sprint PCS provide additional information no later than August 15, 2003, regarding its plans to begin operations, including establishing a point of presence, within any TDS Telecom rate centers, including the anticipated date such operations will begin. Absent specific plans by Sprint PCS to establish a presence in a given rate center, any request for local number portability and the coincident exchange of operational information is premature.

TDS Telecom reserves its right to seek a waiver of the FCC rules pertaining to local number portability and/or to seek suspension or modification of any number portability requirement from the applicable state Commission, pursuant to Section 251(f) of the Telecommunications Act, on behalf of its qualifying subsidiaries.

As indicated in my previous letter, to enable complete and timely response, all correspondence in regards to this matter for any TDS Telecom subsidiary should be directed to:

TDS Telecom  
Carrier Relations  
9737 Cogdill Road, Suite 230  
Knoxville, TN 37932

I can be reached at (865) 671-4758 should you have any questions or wish to discuss this matter further.

Sincerely,

  
Linda Lowrance  
Manager-Interconnection

P.O. BOX 22995  
KNOXVILLE, TN 37933-0995  
9737 COGDILL ROAD, SUITE 230  
KNOXVILLE, TN 37932  
TELEPHONE 865 966 4700  
FAX 865 675 3881

TDS TELECOM Operating Companies  
As of May 31, 2003

Alabama-	Butler Telephone Company, Inc. Oakman Telephone Company, Inc. Peoples Telephone Company
Arizona-	Arizona Telephone Company Southwestern Telephone Company
Arkansas-	Cleveland County Telephone Company, Inc.* Decatur Telephone Company, Inc.
California-	Happy Valley Telephone Company Hornitos Telephone Company Winterhaven Telephone Company*
Colorado-	Delta County Tele-Comm, Inc. Strasburg Telephone Company
Florida-	Quincy Telephone Company*
Georgia-	Blue Ridge Telephone Company Camden Telephone and Telegraph Company* Quincy Telephone Company Nelson-Ball Ground Telephone Company
Idaho-	Potlatch Telephone Company, Inc.
Indiana-	Camden Telephone Company, Inc.* Communications Corporation of Indiana* Communications Corporation of Southern Indiana* Home Telephone Company, Inc.* S&W Telephone Company, Inc. The Home Telephone Company of Pittsboro, Inc.* The Merchants and Farmers Telephone Company* Tipton Telephone Company, Inc. * Tri-County Telephone Company, Inc.*
Kentucky-	Leslie County Telephone Company Lewisport Telephone Company, Inc.* Salem Telephone Company
Maine-	Cobbosseecontee Telephone & Telegraph Company Hampden Telephone Company Hartland and St. Albans Telephone Company Somerset Telephone Company The Island Telephone Company The West Penobscot Telephone and Telegraph Company Warren Telephone Company
Michigan-	Chatham Telephone Company Communications Corporation of Michigan* Island Telephone Company Shiawassee Telephone Company* Wolverine Telephone Company*

Minnesota-	Arvig Telephone Company Bridge Water Telephone Company* Mid-State Telephone Company* Winsted Telephone Company*
Mississippi-	Calhoun City Telephone Company, Inc. Myrtle Telephone Company Southeast Mississippi Telephone Company
Missouri-	New London Telephone Company* Orchard Farm Telephone Company The Stoutland Telephone Company
New Hampshire-	Hollis Telephone Company Kearsarge Telephone Company* Merrimack County Telephone Company* Wilton Telephone Company*
New York-	Deposit Telephone Company, Inc.* Edwards Telephone Company, Inc. Oriskany Falls Telephone Corporation Port Byron Telephone Company Township Telephone Company, Inc. Vernon Telephone Company, Inc
North Carolina-	Barnardsville Telephone Company Saluda Mountain Telephone Company Service Telephone Company
Ohio-	Arcadia Telephone Company* Continental Telephone Company* Little Miami Communications Corporation* Oakwood Telephone Company* The Vanlue Mutual Telephone Company*
Oklahoma-	Mid-America Telephone, Inc. Oklahoma Communication Systems, Inc.* Wyandotte Telephone Company
Oregon-	Asotin Telephone Company Home Telephone Company, Inc.
Pennsylvania-	Deposit Telephone Company, Inc. Mahanoy and Mahantango Telephone Company X Sugar Valley Telephone Company
South Carolina-	McClellanville Telephone Company, Inc. Norway Telephone Company, Inc. St. Stephen Telephone Company Williston Telephone Company*
Tennessee-	Concord Telephone Exchange, Inc. Humphreys County Telephone Company Tellico Telephone Company, Inc.* Tennessee Telephone Company

Vermont-	Ludlow Telephone Company Northfield Telephone Company Perkinsville Telephone Company, Inc.
Virginia-	Amelia Telephone Corporation* New Castle Telephone Company Virginia Telephone Company
Washington-	Asotin Telephone Company* Lewis River Telephone Company, Inc.* McDaniel Telephone Company
Wisconsin-	Badger Telecom, Inc. Black Earth Telephone Company, Inc. Bonduel Telephone Company Burlington, Brighton & Wheatland Telephone Company* Central State Telephone Company* Dickeyville Telephone Corporation Eastcoast Telecom, Inc.* Farmers Telephone Company Grantland Telecom, Inc. Mid-Plains, Inc. Midway Telephone Company Mt. Vernon Telephone Company* Riverside Telecom, Inc.* Southeast Telephone Company of Wisconsin, Inc. Stockbridge & Sherwood Telephone Company* Tenney Telephone Company* The Scandinavia Telephone Company UTELCO, Inc.* Waunakee Telephone Company, Inc.*

\* Companies in receipt of May 16, 2003 correspondence from Sprint PCS



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

January 16, 2004

Mr. Ralph Smith  
Sprint Spectrum  
11880 College Blvd,  
Overland Park, KS, 66210

Re: Wireless Local Number Portability (WLNP) - Top 100 MSAs

Dear Mr. Smith:

On December 22, 2003 we discussed our acknowledgement of Sprint Spectrum's requests for number portability in various operating companies of TDS Telecommunications Corporation ("TDS TELECOM"). Since that time, we have been working to refine our implementation schedule based on carrier request date and switch capabilities. The table at the bottom of this correspondence provides the expected dates of implementation for your requests that are in the top 100 MSAs. Unless we hear otherwise, TDS TELECOM will be proceeding in accordance with the proposed schedule.

Also, I am providing TDS Telecom's Trading Partner Profile (TPP) for the operating companies for which we have received a valid request along with the tentative implementation dates. Enclosed you will find a revised TPP that further refines the implementation dates. Also, enclosed for your review and execution is a proposed Wireless Local Number Portability Operating Agreement. Your assistance in reaching a timely completion of this document will be greatly appreciated.

OCN	GLL	NPA	NXX	EFFECTIVE DATE
0613	FYVLOHXADS0	513	875	2/16/04
1362	ENFDMNXERS0	763	878	2/16/04
1362	MNTIMNXM29G	763	271,295	2/16/04
2427	LACTWAXADS1	360	263	2/23/04
1507	WNSTMNXWRS4	320	485	3/1/04
1984	CHCTOKXADS1	405	390	3/8/04
1984	JONSOKXARS1	405	399	3/8/04
1984	KLVLOKXADS1	918	247	3/8/04
1984	MNDSOKXARS0	918	827	3/8/04
0830	CLFXINXADS0	765	324	3/15/04
0776	CYTNINXARS0	317	539	3/22/04
0776	NWRSINXARS0	765	723	3/22/04
0776	WHTWINXARS0	317	769	3/22/04
0778	WDRNINXADS1	765	525	3/22/04
0777	PTBOINXARS0	317	892	3/22/04



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

As we move forward in providing this new capability between our organizations I am sure there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (608)664-4800 or e-mail [bob.abrams@tdstelecom.com](mailto:bob.abrams@tdstelecom.com).

Sincerely,

*Robert R. Abrams*

525 Junction Road  
P O Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

February 12, 2004

Mr. Ralph Smith  
Sprint Spectrum  
6160 Sprint Parkway  
Overland Park, KS, 66251

Re: Wireless Local Number Portability (WLNP) Update

Dear Mr. Smith:

This is an update on TDS TELECOM's progress toward meeting Sprint Spectrum's number portability requests in many of our local telephone companies. When we last spoke on January 16, I provided a deployment schedule only for your TDS requests only in Top 100 MSA. At that time I also provided an updated Trading Partner Profile, and the then-current draft of our Wireless Local Number Portability Operations Agreement.

In the last few days we have refined our implementation schedule, based on carrier request date and switch capabilities. The table below updates our expected implementation dates for your requests in Top 100 MSAs, and in all other locations for which you've made bona fide requests of us.

Unless we hear otherwise, TDS TELECOM will be proceeding in accordance with the proposed schedule.

OCN	CLL	INPA	INXX	EFFECTIVE DATE IN TOP 100 MSAs
1362	ENFDMNXERS0	763	878	02/16/2004
1362	MNTJMNXM29C	763	271,295	02/16/2004
613	EYVLOHXADS0	513	875	02/16/2004
2427	LACTWAXADS1	360	263	02/23/2004
1507	WNSJMNXWRS4	320	485	03/01/2004
1984	CHGTOKXADS1	405	390	03/08/2004
1984	JONSOKXARS1	405	399	03/08/2004
1984	KLVLOKXADS1	918	247	03/08/2004
1984	MNDSOKXARS0	918	827	03/08/2004
830	CLEXINXADS0	765	324	03/15/2004
776	CYTINXARS0	317	539	03/22/2004
776	NWRSINXARS0	765	723	03/22/2004
776	WHTWINXARS0	317	769	03/22/2004
778	WDRNINXADS1	765	525	03/22/2004
777	PTBOINXARS0	317	892	03/22/2004



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

February 12, 2004

Mr. Ralph Smith  
Sprint Spectrum  
6160 Sprint Parkway  
Overland Park, KS, 66251

Re: Wireless Local Number Portability (WLNP) Update

Dear Mr. Smith:

This is an update on TDS TELECOM's progress toward meeting Sprint Spectrum's number portability requests in many of our local telephone companies. When we last spoke on January 16, I provided a deployment schedule only for your TDS requests only in Top 100 MSA. At that time I also provided an updated Trading Partner Profile, and the then-current draft of our Wireless Local Number Portability Operations Agreement.

In the last few days we have refined our implementation schedule, based on carrier request date and switch capabilities. The table below updates our expected implementation dates for your requests in Top 100 MSAs, and in all other locations for which you've made bona fide requests of us.

Unless we hear otherwise, TDS TELECOM will be proceeding in accordance with the proposed schedule.

OCN	CLL	NPA	NXX	EFFECTIVE DATE IN TOP 100 MSAs
1362	ENFDMNXERS0	763	878	02/16/2004
1362	MNTJMNXM29C	763	271/295	02/16/2004
613	FYVLOHXADS0	613	875	02/16/2004
2427	LACTWAXADS1	360	263	02/23/2004
1507	WNSTMNXWRS4	320	485	03/01/2004
1984	CHGTOKXADS1	405	390	03/08/2004
1984	JONSOKXARS1	405	399	03/08/2004
1984	KEVLOKXADS1	918	247	03/08/2004
1984	MNDSOKXARS0	918	827	03/08/2004
830	CLEXINXADS0	765	324	03/15/2004
776	CYTININXARS0	317	539	03/22/2004
776	NWRSINXARS0	765	723	03/22/2004
776	WHTWINXARS0	317	769	03/22/2004
778	WDRNINXADS1	765	525	03/22/2004
777	PTBOINXARS0	317	892	03/22/2004



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

OCN	CLL	NPA	XX	EFFECTIVE DATE IN Non TOP 100 MSAs
1413	DANBMNXDRS8	320	826	03/01/2004
1413	IRNGMNXIRS2	320	276	03/01/2004
1413	NWLNMMXNDS0	320	354	03/01/2004
1413	SPCRMNXSRS7	320	796	03/01/2004
830	LNDNINXADS0	765	339	03/15/2004
830	RMNYINXADS0	765	538	03/15/2004
738	MGTNMIXIDS1	989	871	03/15/2004
809	POVLINXARS0	812	874	03/22/2004
351	STMYGAXADS1	912	510,573,576, 673,674,729	03/29/2004
0963	MNTIWIXARS0	608	938	04/05/2004
338	GNBOFLXARS0	850	442	04/12/2004
338	GRETFLXARS0	850	856	04/12/2004
338	QNCYFLXADS0	850	627,875	04/12/2004
3320	HNKRNHXARS2	603	428	04/12/2004
47	CNTCNHXADS1	603	746	04/12/2004
578	NIOTTNXARS0	423	568	04/19/2004
578	RCVLTNXARS0	423	462	04/19/2004
2323	WNHVCAXFDS0	760	572	04/26/2004
578	VONRTNXADS1	423	884, 792	04/26/2004
744	BRRWINXARS2	574	652	05/03/2004
744	CMDNINXADS1	574	686	05/03/2004
744	DRCKINXARS2	574	859	05/03/2004
726	BLOKMIXIRS1	517	468	05/10/2004
726	PRRYMIXIDS1	517	625	05/10/2004
726	SGBGMIXIRS1	517	675	05/10/2004
1413	PENCMNXPRS5	320	599	05/10/2004
1698	KGLDARXARS1	870	348	05/17/2004
1698	RISNARXADS0	870	325	05/17/2004
672	AGSTMIXJDS1	269	731	05/17/2004
45	CHCHNHXADS1	603	798	05/24/2004
45	BSCWNHXARS1	603	796	05/24/2004
50	WTONHXADS0	603	654	05/31/2004
809	WSVLINXARS0	812	673	05/31/2004
3321	HLLSNHXADS0	603	465	06/07/2004
585	ARCDOHXADS1	419	894	06/07/2004
662	VANLOHXARS0	419	387	06/07/2004
0217	AMELVAXADS1	804	561	06/14/2004
738	SNFRMIXIDS1	989	687	06/21/2004
0917	MTVRWIXARS1	608	832	06/28/2004
0917	NWGLWIXARL0	608	527	06/28/2004
0968	WAUNWIXADS1	608	849, 850	06/28/2004
0856	BHLKWIXADS1	262	539	07/12/2004
0856	WTLDWIXARS0	262	537	07/12/2004
0914	CLEVVIXADS1	920	693	07/12/2004
0914	HWGVWIXARS0	920	565	07/12/2004

525 Junction Road  
P O. Box 5158  
Madison, WI 53705-0158  
FAX: (608) 664-4800



Bob Abrams  
Manager, Carrier Relations  
(608)664-4800  
bob.abrams@tdstelecom.com

0914	VLDRWIXARS0	920	775	07/12/2004
89	AFTNNYXADS0	607	639	07/19/2004
89	DPSTNYXADS0	607	467	07/19/2004
89	HRSVNYXADS0	607	693	07/19/2004
89	WNDSNYXADS0	607	655	07/19/2004
551	WLSTSCXADS1	803	266	07/26/2004
0943	JHCKWIXADS1	920	699	08/09/2004
412	LWPTKYXADS0	270	295	08/30/2004
788	HLBOINXADS0	765	798	09/06/2004
607	CNTLOHXADS0	419	596	09/06/2004
607	GVHLOHXARS2	419	587	09/06/2004
607	MLLCOHXARS2	419	876	09/06/2004
645	OKWDOHXARS0	419	594	09/06/2004
859	JNCYWIXADS0	715	457	09/13/2004
859	RHFDWIAARS0	715	591	09/13/2004
954	SHWDWIXADSA	920	989	09/20/2004
1928	NWLNMOXADSA	573	985	N/A (Switch Replacement)
1984	FELGNOKXARS1	580	492	N/A (Switch Replacement)
1984	FLTCOKXARS1	580	549	N/A (Switch Replacement)
1984	VRDNOKXARS1	405	453	N/A (Switch Replacement)
2404	ASOTWAXADS0	509	243	N/A (Switch Replacement)
0958	ALMAWIXADS0	608	685	N/A (Switch Replacement)

Ralph, I want to reiterate that several of our older Siemens DCO switches are being replaced to make number portability possible. I do not yet have completion dates for these, but will provide as soon as schedules are firm.

Again, as we move forward in providing this new capability between our organizations, there will be questions and issues to be answered and resolved. Please direct these matters to my attention at telephone (608)664-4800 or e-mail [bob.abrams@tdstelecom.com](mailto:bob.abrams@tdstelecom.com)

Sincerely,

Manager, Carrier Relations  
TDS TELECOM

525 Junction Road  
P.O. Box 5158  
Madison, WI 53705-0158  
FAX. (608) 664-4800

TEC  
CROCKETT  
PEOPLES  
WEST TN

RECEIVED

2004 MAY 27 PM 2:02

T.R.A. DOCKET ROOM



## GENERAL SERVICES TARIFF

EXHIBIT H

Crockett Telephone Co., Inc

TRA Tariff 1

SECTION IV

Lera Roark

2nd Revised Page 2

Vice President

Cancels 1st Revised Page 2

Issued: 5/19/02

Effective: 7/1/02

## 3. BASIC LOCAL EXCHANGE SERVICE

## 3. COUNTY SEAT CALLING\*

- A. Two-way calling is provided between the following county seat exchanges and designated areas of county fringe exchanges on a direct dialed (1+) basis without charge to the caller. These additional local calling areas are not provided to public and semipublic telephone service. All operator assisted calls between these exchanges are subject to toll charges per the concurrence in Section V, of this tariff.

County Seat ExchangeFringe Area Exchanges

Alamo

Halls

Alamo

Humboldt

Dyersburg

Friendship

Brownsville

Maury City

## B. CONTIGUOUS COUNTY CALL CREDITS FOR NON BELLSOUTH CUSTOMERS

Customers who presubscribe to an intraLATA carrier other than BellSouth will continue to receive contiguous county call credits as follows:

1. Special billing records will be generated to determine the minutes of use within a billing cycle that are made to contiguous counties for each customer who is presubscribed to an intraLATA carrier other than BellSouth.
2. The total call minutes will be summed each billing cycle and a credit of 5.5 cents will be applied, up to a maximum of 180 minutes, per month. The customer will receive a credit on their telephone bill for the number of minutes, up to one hundred eighty (180) minutes, on the bill rendered for the billing cycle. (T)

\*This service is provided pursuant to TRA Order No. U-88-7588, dated October 5, 1988.

This service is amended pursuant to TRA Docket No 99-00995 dated April 19, 2002. (N)

## GENERAL SERVICES TARIFF

*Exhibit A*

Peoples Telephone Company, Inc.

TPSC Tariff 1

SECTION 3

Lera Roark

2nd Revised Page 3

Vice President

Cancels 1st Revised Page 3

Issued: 5/19/02

Effective: 7/1/02

## 3. BASIC LOCAL EXCHANGE SERVICE

3.3 Local Calling Areas

<u>Exchange</u>	<u>Additional Exchanges</u>	
Erin	Henry, Tennessee Ridge, Vanleer	(N)
Henry	Erin, McKenzie, Paris, Tennessee Ridge	(N) (N)
Tennessee Ridge	Erin, Henry, Vanleer	(N)

3.4 Concessions

## 1 Employees' Service

Service may be furnished wholly or partially at the expense of the Company at the residence of Employees, when in its judgement, the interests of the Company in rendering continuous and adequate service to the public will be advanced thereby. These arrangements shall be limited to employees who are likely to be communicated with at their residence outside of regular office hours, concerning affairs relating to the business of the Telephone Company

## 2. Concession to schools (grades K-12 Only) for School/Parent Systems

Schools (Grades K-12) using auto dialers/voice mail communication systems to notify parents of important school events and child absenteeism will be provided access lines at the discounted rates set forth below. This discount will apply to lines installed for the sole purpose of school/parent communication systems.

1. Schools for grades K-12 will be charged the residential flat rate for access lines used for School/Parent Communication Systems only
2. Schools will only be permitted one access line at residential rates per 100 students, or fraction thereof.

This service is amended pursuant to TRA Docket No 99-00995 dated April 19, 2002. (N)

## GENERAL SERVICES TARIFF

EXHIBIT II

West Tennessee Telephone Company, Inc

TRA Tariff 1

SECTION 3

3rd Revised Page 3

Cancels 2nd Revised Page 3

Lera Roark

Vice President

Issued: 4/28/04

Effective: 5/28/04

## 3. BASIC LOCAL EXCHANGE SERVICES

*2nd revised attached*3.3 Local Calling Areas

The rates specified in Basic Local Exchange Services entitle subscribers to access all stations bearing the BellSouth central office designations of additional exchanges as shown following. The local calling area of the exchange in the left-hand column also includes the exchanges listed in the right-hand column.

(N)

ExchangeAdditional Exchanges

Atwood

Bradford, Bruceton<sup>1</sup>, Cedar Grove<sup>1</sup>,  
Huntington<sup>1</sup>, McKenzie<sup>1</sup>, Milan<sup>1</sup>, Rutherford,  
and Trezevant

(C)

Bradford

Atwood, Brazil<sup>1</sup>, Dyer<sup>1</sup>, Gibson<sup>1</sup>, Humboldt<sup>1</sup>,  
Medina<sup>1</sup>, Milan<sup>1</sup>, Rutherford, Trenton<sup>1</sup>,  
Trezevant, and Yorkville<sup>1</sup>,

Rutherford

Atwood, Bradford, Brazil<sup>1</sup>, Dyer<sup>1</sup>, Gibson<sup>1</sup>,  
Humboldt<sup>1</sup>, Kenton<sup>1</sup>, Mason Hall<sup>1</sup>, Medina<sup>1</sup>,  
Milan<sup>1</sup>, Trenton<sup>1</sup>, Trezevant, and Yorkville<sup>1</sup>.

Trezevant

Atwood, Bradford, Bruceton<sup>1</sup>, Cedar Grove<sup>1</sup>,  
Huntington<sup>1</sup>, McKenzie<sup>1</sup>, and Rutherford.

(C)

Note <sup>1</sup> : BellSouth Exchange NXX's only

(N)

This service is amended pursuant to TRA Docket No. 99-00995 dated April 19, 2002

## GENERAL SERVICES TARIFF

West Tennessee Telephone Company, Inc

TRA Tariff 1

SECTION 3

Lera Roark

2nd Revised Page 3

Vice President

Cancels 1st Revised Page 3

Issued: 5/19/02

Effective: 7/1/02

## 3. BASIC LOCAL EXCHANGE SERVICES

3.3 Local Calling AreasExchangeAdditional Exchanges

Atwood

Bradford, Bruceton, Ceder Grove.

(N)

Huntington, Milan, Rutherford, and

(N)

Trezevant

Bradford

Atwood, Brazil, Dyer, Gibson, Humboldt,

(N)

Medina, Milan, Rutherford, Trenton,

Trezevant, and Yorkville.

(N)

Rutherford

Atwood, Bradford, Brazil, Dyer, Gibson,

(N)

Humboldt, Kenton, Mason Hall, Medina,

Milan, Trenton, Trezevant, and Yorkville.

(N)

Trezevant

Atwood, Bradford, Bruceton, Ceder Grove,

(N)

Huntington, McKenzie, and Rutherford.

(N)

This service is amended pursuant to TRA Docket No. 99-00995 dated April 19, 2002.

(N)



Exhibit B

To: AT&T Wireless  
 From: Crockett Telephone Company, Inc.  
 Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0561
2. The CLLI Codes of our switches are as follows:
 

<u>NPANXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/656	Maury City	MRCYTNXARS5
731/677	Friendship	FRSHTNXARS5
731/696	Alamo (Host)	ALAMTNXADS1

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov 10, 2003).*

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.
4. Requests and inquiries should be directed to:  
 Mr Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164
5. Business Hours: 8:00a.m. - 5:00p.m. CST
6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

1 3 0 9 L O U I S V I L L E A V E N U E  
 M O N R O E L A 7 1 2 0 1  
 - - -



COPY

3-24-04

To: Verizon Wireless  
 From: Crockett Telephone Company, Inc.  
 Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company

1. Our company operates under the following OCN: 0561
2. The CLLI Codes of our switches are as follows.

<u>NPA/NXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/656	Maury City	MRCYTNXARS5
731/677	Friendship	FRSHTNXARS5
731/696	Alamo (Host)	ALAMTNXADS1

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.
4. Requests and inquiries should be directed to.  
 Mr. Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164
5. Business Hours: 8:00a.m. - 5:00p.m. CST
6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

1 3 0 9 L O U I S V I L L E A V E N U E  
 M O N R O E L A 7 1 2 0 1  
 P H O N E 3 1 8 3 2 2 0 0 1 5 . F A X 3 1 8 3 2 3 2 1 6 4



Exhibit B

4-14-04

To: Southern LINC  
 From: Peoples Telephone Company, Inc.  
 Date: April 14, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1. Our company operates under the following OCN: 0576

2. The CLLI Codes of our switches are as follows

<u>NPA/NXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/243	Henry	HNRYTNXARS5
931/721	Tennessee Ridge	TNRGTNXARS5
931/289	Erin (Host)	ERINTNXADS2

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues; Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para 22 (rel. Nov. 10, 2003).*

- Our company does not utilize any electronic automated interface to process interconnection or service requests
- Requests and inquiries should be directed to.  
 Mr. Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164
- Business Hours: 8:00a.m. - 5:00p.m. CST
- We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.



Exhibit B

To: AT&T Wireless  
 From: Peoples Telephone Company, Inc.  
 Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

- 1 Our company operates under the following OCN. 0576
- 2 The CLLI Codes of our switches are as follows:
 

<u>NPA/NXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/243	Henry	HNRYTNXARS5
931/721	Tennessee Ridge	TNRGTNXARS5
931/289	Erin (Host)	ERINTNXADS2

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues; Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284, para 22 (rel. Nov. 10, 2003).*

- 3 Our company does not utilize any electronic automated interface to process interconnection or service requests.
- 4 Requests and inquiries should be directed to  
 Mr. Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164
- 5 Business Hours: 8:00a.m. – 5:00p.m. CST
- 6 We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.



Exhibit B

To: Verizon Wireless  
 From: Peoples Telephone Company, Inc.  
 Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1 Our company operates under the following OCN: 0576

2 The CLLI Codes of our switches are as follows

<u>NPA/NXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/243	Henry	HNRVTNXARS5
931/721	Tennessco Ridge	TNRGTNXARS5
931/289	Erin (Host)	ERINTNXADS2

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY. (See, *In the Matter of Telephone Number Portability; CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues; Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, FCC 03-284, para 22 (rel. Nov. 10, 2003).

3. Our company does not utilize any electronic automated interface to process interconnection or service requests.

4 Requests and inquiries should be directed to:  
 Mr. Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164

5. Business Hours: 8:00a.m - 5:00p.m. CST

6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request

1 3 0 9 L O U I S V I L L E A V E N U E  
 M O N R O E L A 7 1 2 0 1  
 P H O N E 3 1 8 3 2 2 0 0 1 5 . F A X 3 1 8 3 2 3 2 1 6 4

Exhibit 10



POST OFFICE DRAWER 2146 . MONROE LOUISIANA 71207

To: Verizon Wireless  
 From: West Tennessee Telephone Company, Inc.  
 Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1 Our company operates under the following OCN. 0583

2. The CLLI Codes of our switches are as follows:

<u>NPA/NXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/662	Atwood	ATWDTNXARS0
731/665	Rutherford	RTFRTNXARS0
731/669	Trezevant	TRZVTNXARS5
731/742	Bradford (Host)	BRFRTNXADS2

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY (See, *In the Matter of Telephone Number Portability: CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No 95-116, FCC 03-284, para. 22 (rel. Nov. 10, 2003).*

3 Our company does not utilize any electronic automated interface to process interconnection or service requests

4. Requests and inquiries should be directed to:  
 Mr. Jason Ott, Special Services Director  
 1309 Louisville Avenue, Monroe LA 71201  
 Phone 318-322-0015 Fax 318-323-2164

5 Business Hours 8 00a.m. - 5:00p.m CST

6 We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request.

1 3 0 9 L O U I S V I L L E A V E N U E  
 M O N R O E L A 7 1 2 0 1  
 P H O N E 3 1 8 3 2 2 0 0 1 5 . F A X 3 1 8 3 2 3 2 1 6 4



celsson

COPY

MAILED

3-24-04

POST OFFICE DRAWER 2146 . MONROE LOUISIANA 71207

To: AT&T Wireless  
From: West Tennessee Telephone Company, Inc.  
Date: March 24, 2004

Our company has received information requests from multiple CMRS providers, including your company. As reflected by the requests, each CMRS provider utilizes its own format, acronyms, and processes. We offer this memorandum in good faith to provide your company with the information available regarding the implementation of wireline to wireless LNP at our company.

1 Our company operates under the following OCN: 0583

2. The CLLI Codes of our switches are as follows:

<u>NPA/XXX</u>	<u>EXCHANGE</u>	<u>CLLI</u>
731/662	Atwood	ATWDTNXARS0
731/665	Rutherford	RTFRTNXARS0
731/669	Trezevant	TRZVTNXARS5
731/742	Bradford (Host)	BRFRTNXADS2

The rate center V and H coordinates associated with our switches are provided in NECA Tariff FCC No. 4.

PLEASE CONFIRM TO US IN WRITING THAT YOUR COVERAGE OVERLAPS THE RATE CENTER OF EACH SPECIFIC SWITCH WITH RESPECT TO WHICH YOU ARE REQUESTING LNP CAPABILITY (See, In the Matter of Telephone Number Portability, CTIA Petition for Declaratory Ruling on Wireline-Wireless Porting Issues: Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No 95-116, FCC 03-284, para 22 (rel. Nov. 10, 2003).

3. Our company does not utilize any electronic automated interface to process interconnection or service requests
4. Requests and inquiries should be directed to  
Mr. Jason Ott, Special Services Director  
1309 Louisville Avenue, Monroe LA 71201  
Phone 318-322-0015 Fax 318-323-2164
5. Business Hours: 8 00a.m. - 5 00p m. CST
6. We require full billing name, billing address, account number, and identifying number (social security number or tax id number) to validate a porting request

TWIN LAKES TELEPHONE COOPERATIVE  
CORP.

RECEIVED

2004 MAY 27 PM 2:02

T.R.A. DOCKET ROOM

**TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**  
**Local Exchange Tariff**

**SECTION 1**  
**Revised Sheet 4**  
**February 23, 1998**

**LOCAL EXCHANGE SERVICE**

**I. DESCRIPTION OF OPERATIONS (Continued)**

**B. Local Calling Areas (Continued)**

<u>Exchange</u>	<u>(NPA-NXX)</u>	<u>Additional Exchanges</u>	<u>(NPA-NXX)</u>
Gainesboro	(931-268)	Celina	(931-243)
		Granville	(931-653)
		Highland	(931-678)
		Moss	(931-258)
		North Springs	(931-621)
Gainesboro	(931-405)	Future Use	
Granville	(931-653)	Celina	(931-243)
		Chestnut Mound	(615-897)
		Gainesboro	(931-268)
		Highland	(931-678)
		Moss	(931-258)
		North Springs	(931-621)
Highland	(931-678)	Carthage	(931-735)
		Celina	(931-243)
		Gainesboro	(931-268)
		Granville	(931-653)
		Moss	(931-258)
		North Springs	(931-621)
Jamestown	(931-879)	Byrdstown	(931-864)
		Clarkrange	(931-863)
		Crawford	(931-445)
		Livingston	(931-823)
		Livingston	(931-403)
		Rickman	(931-498)

Effective: September 1, 1996

**TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**  
**Local Exchange Tariff**

**SECTION 1**  
**Revised Sheet 5**  
**February 23, 1998**

**LOCAL EXCHANGE SERVICE**

**I. DESCRIPTION OF OPERATIONS (Continued)**

**B. Local Calling Areas (Continued)**

<u>Exchange</u>	<u>(NPA-NXX)</u>	<u>Additional Exchanges</u>	<u>(NPA-NXX)</u>
Livingston	(931-823)	Byrdstown	(931-864)
		Clarkrange	(931-863)
		Crawford	(931-445)
		Livingston	(931-403)
		Rickman	(931-498)
		Jamestown	(931-879)
Livingston	(931-403)	Byrdstown	(931-864)
		Clarkrange	(931-863)
		Crawford	(931-445)
		Livingston	(931-823)
		Rickman	(931-498)
		Jamestown	(931-879)
Moss	(931-258)	Celina	(931-243)
		Gainesboro	(931-268)
		Granville	(931-653)
		Highland	(931-678)
		North Springs	(931-621)
		Red Boiling Springs (Clay County)	(615-699)
North Springs	(931-621)	Celina	(931-243)
		Gainesboro	(931-268)
		Granville	(931-653)
		Highland	(931-678)
		Moss	(931-258)

Effective: September 1, 1996

**TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**  
**Local Exchange Tariff**

**SECTION 1**  
**Revised Sheet 6**  
**February 23, 1998**

**LOCAL EXCHANGE SERVICE**

**I. DESCRIPTION OF OPERATIONS (Continued)**

**B. Local Calling Areas (Continued)**

<u>Exchange</u>	<u>(NPA-NXX)</u>	<u>Additional Exchanges</u>	<u>(NPA-NXX)</u>
Rickman	(931-498)	Byrdstown	(931-864)
		Clarkrange	(931-863)
		Crawford	(931-445)
		Jamestown	(931-879)
		Livingston	(931-823)
		Livingston	(931-403)

All rules, regulations and rates of the Cooperative apply to the above exchanges unless otherwise specifically noted in this tariff.

**TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**  
**Local Exchange Tariff****SECTION 1**  
**Original Sheet 7****LOCAL EXCHANGE SERVICE****II. APPLICATION OF RATES**

The rates listed in this section apply to Local Exchange Service provided by the Cooperative in its service area.

Unless otherwise specified, the rates quoted in this section are for a minimum contract period of one month. These rates are payable in advance and provide unlimited flat rate calling within the exchange area.

Local access trunks may be required for local access connections terminating in, or for use with, some types of customer-provided equipment.

**III. LOCAL EXCHANGE SERVICE RATES**

	<u>Monthly Rates</u>
A. Business Individual Line	\$ 19.00
B. Residence Individual Line	10.50
C. PBX Trunk	30.00
D. Semi-Public Telephone Service	40.00
E. Customer-Owned Paystation	28.50

Effective: September 1, 1996

**TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**  
Local Exchange Tariff

**SECTION 1**  
Revised Sheet 8  
07/15/02

**LOCAL EXCHANGE SERVICE**

**LINK-UP and LIFELINE ASSISTANCE PROGRAM**

**IV. LINK-UP ASSISTANCE**

The program offsets up to one-half of the nonrecurring service connection charges or \$30.00 whichever is less.

**V. LIFELINE ASSISTANCE**

Twin Lakes Telephone Cooperative Corporation participates in the federal program for Lifeline discounts. The program provides for reimbursement of the \$6.00 line access charge. Lifeline customers will receive an additional \$1.75 in Federal support for their local service rates bringing the total contribution to \$7.75. Customers must meet the Federal eligibility guidelines for participation.

**VI. Intra Company Toll Free Calling**

Intra Company Toll Free Calling is available to Twin Lakes Telephone Cooperative customers to and from each of the Cooperative exchanges. 243, 258, 268, 403, 405, 445, 476, 498, 621, 653, 678, 752, 823, 858, 863, 864, 879, 897.

YORKVILLE TELEPHONE COOPERATIVE

RECEIVED

2001 MAY 27 PM 2:02

U.S. I.R.A. DOCKET ROOM

3. BASIC LOCAL EXCHANGE SERVICE

LOCAL CALLING AREAS

EXCHANGE

Brazil

Mason Hall

Trimble

Yorkville

ADDITIONAL EXCHANGES

Bradford, Dyer, Gibson  
Humboldt, Medina, Milan,  
Rutherford, Trenton,  
Yorkville

Kenton, Rutherford,  
Trimble, Union City,  
Yorkville

Dyersburg, Mason Hall,  
Newbern, Yorkville

Bradford, Brazil, Dyer,  
Gibson, Humboldt, Mason  
Hall, Medina, Milan,  
Newbern, Rutherford,  
Trenton, Trimble

4

5

6

7

8

9

4 Newbern Hwy  
P O Box 8



TEL 731-643-6121  
FAX 731-643-6600

Yorkville, TN 38389

[www.yorkvilletel.com](http://www.yorkvilletel.com)

April 7, 2004

*COPY*  
*Sent via*  
*UPS*

Verizon Wireless  
Attn: Linda Godfrey  
Interconnection/Numbering  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Dear Ms. Godfrey:

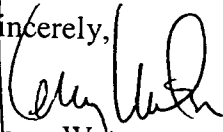
Please let this letter serve as an update to our implementation for LNP for both Yorkville Telephone Cooperative and our subsidiary, Yorkville Communications, Inc. Our OCN numbers are as follows:

Yorkville Telephone Cooperative Landline	0584
Yorkville Telephone Cooperative Wireless	162C
Yorkville Communications, Inc Wireless	3378

Yorkville Telephone Cooperative and Yorkville Communications, Inc. anticipate being ready to implement LNP by no later than August 24, 2004 due to switch vendor delays in supplying software for LNP and a need to test adequately in advance of the deployment date. This deployment plan has been described in a petition for extension of time filed with the FCC.

Again, thanks for your cooperation in this matter. Please feel free to contact me should you have additional questions.

Sincerely,

  
Kerry Watson  
General Manager

cc. Robert Galloway, Cellular Manager  
Susan Walker, Roaming/LNP Coordinator

**Trading Partner Profile for Porting  
for AT&T Wireless Services, Inc. (AWS)  
and Yorkville Telephone**

<b>C O N T A C T</b>	Item	Yorkville Telephone	AT&T Wireless
	Effective Date		
	Primary contact name	Susan Walker	Porting Administration Group (PAG)
	Contact description	/	
	Phone number #1	731-643-6121	800-243-6530
	Phone number #2	888-206-6017	
	FAX number	731-643-6600	800-627-6054
	Email address	<a href="mailto:swalker@yorkvilletel.com">swalker@yorkvilletel.com</a>	<a href="mailto:Aws.porting.admin@attws.com">Aws.porting.admin@attws.com</a>
	Other		
	Note #1: For AWS, the above "primary contact" is the first point of contact for porting resolution issues.		
	Note #2: For AWS, the "secondary contact" below is the first point of contact for issues directly related to the network (switch to switch interface) An example of a network issue would be the misrouting of LRNs from one switch to another.		
	Secondary contact name		Wireless Network Control Center (WNCC)
	Contact description	Terry Allmon	
	Phone number #1	731-643-6121	800-832-6662 option 4
	Phone number #2	731-643-6500	N/A
	FAX number		N/A
	Email address		
	Other		

<b>O P E R A T I O N S</b>	Item	Yorkville Telephone	AT&T Wireless
	... Common ...		
	Operating Company No. (OCN)	162C	6010
	Administrative OCN	162C	6010
	Wireless or Wireline	Wireless	Wireless
	Holiday Days (mm/dd/yy)	All Major	Thanksgiving, only
	Holiday time begin (hh:mm)	Standard close on business day before	Standard close on business day before
	Holiday time end (hh:mm)	Standard open on business day after	Standard open on business day after
	NPAC Timer (Long or Short)	Long	Long - T1/T2 9 hours
	... for Test ...		
	Service Provider ID (SPID)	162C	6010
	LSMS SPID	162C	6010
	LSR Version ID		LSOG 5 or Higher
	FOC Version ID		LSOG 5 or Higher
	WICIS Version ID		2 0.1
	Time Zone (PT, MT, CT, ET)		CT
	Business days (Sun, Mon, etc.)	M-F	Monday through Sunday
	Business day begin (hh:mm)	8 00 AM CT	7:00 AM CT Monday through Saturday 9 00 AM CT Sunday



ICP Package/Application ("send to")		66.150.123.71
ICP Physical Server ("receive from")		66.150.123.71
Failover ICP Server		
SOA Application		
SOA Server		
Failover SOA Server		
Application Port Information		20059
Naming Service / IOR		IOR
DLCI		
LDAP Provider		N/A
Security Requirements		WICIS 2.0.1
Firewall Requirements		
SSL Requirements		
Proprietary Requirements		
Service IDL version		2.3
Implementation OMG standard compliant?		Yes

F A X	<b>Item</b>	<b>Yorkville Telephone</b>	<b>AT&amp;T Wireless</b>
	<b>... for Test ...</b>		
	Porting Method: Primary, Secondary, N/A	Secondary	Secondary
	FAX number	731-643-6600	800-627-6054
	Backup FAX number		N/A
	<b>... for Production ...</b>		
	Porting Method: Primary, Secondary, N/A	Secondary	Secondary
	FAX number	731-643-6600	800-627-6054
	Backup FAX number		N/A

E D I	<b>Item</b>	<b>Yorkville Telephone</b>	<b>AT&amp;T Wireless</b>
	<b>... for Test ...</b>		
	Porting Method: Primary, Secondary, N/A		
	Specific EDI Requirements		
	<b>... for Production ...</b>		
	Porting Method: Primary, Secondary, N/A		
	Specific EDI Requirements		

O T H E R	<b>Item</b>		<b>AT&amp;T Wireless</b>
	<b>... for Test ...</b>		
	Porting Method: Primary, Secondary, N/A		Secondary
	Other Communication Requirements		<a href="mailto:Aws_porting_admin@attws.com">Aws_porting_admin@attws.com</a>
	<b>... for Production ...</b>		

	Porting Method: Primary, Secondary, N/A		Secondary
	Other Communication Requirements		<u>Aws.porting.admin@attws.com</u>

## **Information Required for Logging Trouble Tickets**

### **AWS:**

- Customer name and organization.
- Full description of the issue and expected results.
- Steps to reproduce the issue and relevant data.
- All applicable issue, log, and system files.
- Any special circumstances surrounding the discovery of the issue (e.g., first occurrence or occurred after what specific event).
- Customer's business impact of problem and suggested priority for resolution.

**Yorkville Telephone:**

## **Porting Validation Standards**

### **AWS:**

AWS may validate on any or all of the following fields:

1. Desired Due Date and Time
2. MDN
3. Zip Code
4. Password/PIN
5. Social Security Number/Tax ID or Account Number

**Yorkville Telephone:**

1. SSN/Tax ID
2. MDN
3. Due Date / Time
4. Name
5. Account Number

## **Porting Business Rules**

### **AWS:**

- **Multi-line Ports** – On WPRs submitted to AWS, the MDNs to be ported must be listed individually and not as a line range
- **Resellers** – AWS will follow the NANC flows for resellers.
- **WICIS sunrise/sunset** – AWS intends to be able to support more than one version of the WICIS during any sunrise/sunset period
- **NPAC regions supported** – All (except Canada)
- **Maintenance** – AWS will schedule the regular maintenance and downtime of its systems during the NPAC's scheduled maintenance windows. If AWS needs to take its systems offline during other time periods, AWS will notify the other Party pursuant to industry agreed to policies and procedures.

**Yorkville Telephone:**

**Yorkville Telephone Cooperative  
4 Newbern Highway  
PO Box 8  
Yorkville, Tennessee 38389**

731-643-6121  
Fax 731-643-6600  
Back-Up Fax 731-643-6715

**OCN List For Yorkville Telephone Cooperative**

State	OCN
TN	0584

Yorkville Telephone Cooperative SPID – Application sent to NPAC. SPID for Yorkville Telephone Cooperative is 0584.

**Contact:** Mr. Kerry Watson  
General Manager  
[kwatson@yorkvilletel.com](mailto:kwatson@yorkvilletel.com)  
1-800-206-6017

Mr. Robert Galloway  
Cellular Manager  
[rgalloway@yorkvilletel.com](mailto:rgalloway@yorkvilletel.com)  
1-800-206-6017

Mr. Eddie Crain  
Wireline Switch Technician  
1-800-206-6017

- Yorkville Telephone Cooperative is outside the top 100 MSA and will be prepared to port as of May 24, 2004.
- Please note that Yorkville Telephone Cooperative has entered into agreement with TSI, Telecommunication Services Incorporated for all porting activities.

**General Contact Information:**

Wireline-to-Wireless Porting  
Wireless-to-Wireless Porting

**Hours of Operation:** Monday – Friday  
8:00AM – 5:00 PM  
Closed all major holidays

4 Newbern Highway  
PO Box 8  
Yorkville, Tennessee 38389  
Phone: 731-643-6121

Yorkville Telephone Cooperative will be the initial interface for all questions and trouble resolution activity associated with porting numbers. Yorkville Telephone Cooperative will then refer all issues to TSI for resolution.

4 Newbern Hwy  
P O Box 8



TEL: 731-643-6121  
FAX: 731-643-6600

Yorkville, TN 38389

[www.yorkvilletele.com](http://www.yorkvilletele.com)

**COPY**

September 26, 2003

Verizon Wireless  
Attn: Linda Godfrey  
Interconnection/Numbering  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Dear Ms. Godfrey:

This letter is in response to your letter dated September 5, 2003. Our response has been delayed due to scheduled business travel.

We are hopeful as you are that the FCC will soon issue clarifications to its rules that bear upon intercarrier porting obligations. As indicated in my letter to you dated July 7, 2003, our wireless service area covers an area of western Tennessee that is not within the top-100 markets. As such, wireless local number portability ("WLNP") is not required in our service area before May 24, 2004. In the meantime, we are in communication with our switch vendor about WLNP functionality and we are also pursuing a necessary software upgrade.

Because more than six months remain before WLNP must be offered in our area and the fact that the FCC has not yet ruled on certain implementation issues that are important to small carriers, we consider it premature to begin negotiation of a service level porting agreement at this time. If you wish to contact me again after the FCC issues its WLNP clarifications we will be pleased to revisit the issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kerry Watson', is written over the word 'Sincerely,'.

Kerry Watson  
General Manager

4 Newbern Hwy  
P O Box 8



TEL: 731-643-6121  
FAX: 731-643-6600

Yorkville, TN 38389

[www.yorkvilletel.com](http://www.yorkvilletel.com)

**COPY**

September 30, 2003

Verizon Wireless  
Bonnie Petti  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Re: Wireline-Wireless Local Number Portability Agreement

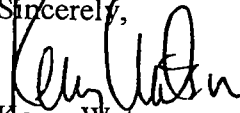
Dear Ms. Petti:

This letter is in response to your letter dated September 24, 2003 indicating that Verizon Wireless would like to establish an Intercarrier Communications Process ("ICP") for porting of numbers between Verizon Wireless and Yorkville Telephone Cooperative in its capacity as a wireline carrier ("YTC").

Please note that YTC provides landline service outside of the top-100 markets of the United States. As such, any obligation by YTC to accommodate local number portability would not be earlier than March 24, 2004 which is six months after the date of your letter. As such there appears to be ample time to await FCC clarifications to its rules that bear upon intermodal porting obligations in the absence of an interconnection agreement between the two carriers.

Until the FCC rules on intermodal porting obligations, including whether an interconnection agreement between carriers is essential, we consider it premature to recognize your letter of September 24, 2003 as a "bona fide request" ("BFR") to YTC for LNP. After the FCC issues its clarifications we will review your request and, if appropriate, work with Verizon Wireless in negotiation of a service level agreement ("SLA") to govern any porting activity.

Sincerely,

  
Kerry Watson  
General Manager

4 Newbern Hwy  
P O Box 8



TEL: 731-643-6121  
FAX: 731-643-6600

Yorkville, TN 38389  
[www.yorkvilletel.com](http://www.yorkvilletel.com)

**COPY**

November 20, 2003

Linda Godfrey  
Verizon Wireless  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Dear Ms. Godfrey:

I received your request today for a Trading Partner Profile (TPP) dated November 18, 2003. At this point, Yorkville Telephone Cooperative will not be able to port before the May 24, 2004 deadline. Enclosed you will find our information for Yorkville Telephone Cooperative. If you have additional questions, feel free to contact me anytime at 731-643-6121.

Sincerely,

Kerry Watson  
General Manager

Network Operations Support

September 5, 2003

Yorkville Telephone Co  
Kerry Watson  
4 Newbern Hwy, PO Box 8  
Yorkville, TN 38389



Verizon Wireless  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

Re: Bona Fide Request for Number Portability ("BFR")

Dear Kerry Watson,

Verizon Wireless has upgraded all of its switches for wireless number portability and plans to offer customers the ability to port in our mutual overlapping service areas, as required by the FCC's rules. Previously, Verizon Wireless mailed a bona fide request for number portability to your company, consisting of a cover letter and an attached industry-developed bona fide request form. The BFR was intended to ensure that consumers can enjoy the benefits of competitive porting among carriers, where requested by a competing carrier, by November 24, 2003, or a subsequent timeframe as outlined by the FCC's rules.<sup>13</sup>

Verizon Wireless requested information designed to determine (1) where porting is currently available; and most importantly, (2) where and when porting would be available in additional switches not currently porting capable. To this end, Verizon Wireless provided specific information regarding the targeted MSAs

Verizon Wireless does not accept your response rejecting its BFR. Verizon Wireless hereby renews its original request with the same effective date triggered by that request. Specifically, Verizon Wireless rejects the following argument offered by your company and/or other companies that the BFR must be predicated on resolution of pending issues before the FCC regarding business rules and any other remaining operational issues. Although Verizon Wireless believes that these issues will be resolved well before the November 24, 2003 deadline for wireless portability, resolution is not required for issuance of the BFR and compliance is not excused during the FCC's deliberations.

Verizon Wireless expects that you will comply with the FCC's rules and honor its BFR upon request of a customer to port his or her number to Verizon Wireless. Verizon Wireless will pursue all legal or enforcement remedies before the FCC if your company refuses to provide LNP with Verizon Wireless on or after November 24, 2003.

A handwritten signature in cursive script, reading "Linda Godfrey".

Linda Godfrey  
Verizon Wireless  
Network Operations Headquarters Staff

cc: John T. Scott, Deputy General Counsel

<sup>13</sup> The timeframes for conversion to LNP of any additional switches are governed by the FCC's rules and range from 30 days to 180 days, depending upon the status of the switches (i.e., equipped remote, hardware capable, capable switches requiring hardware, and non-capable) 47 C.F.R. § 52.23 (b)(2)(iv)(A-D)

Network Operations Support



Verizon Wireless  
Interconnection/Numbering/Mandates  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

September 24, 2003

Yorkville Telephone Cooperative  
4 Newburn Highway  
Yorkville, TN 38389

Re: Wireline-Wireless Local Number Portability Agreement

Dear Kerry Watson:

Verizon Wireless would like to establish an Inter-carrier Communications Process (ICP) for porting of numbers between Verizon Wireless and Yorkville Telephone Cooperative. We need to reach agreement quickly given the pending FCC deadline.

Attached is a proposed service level agreement which we believe will facilitate quick, reliable, and seamless porting for our respective customers.

Please let me know your availability, so that we can set a time for a meeting. Please direct your response to our single point of contact, Sharon Cañas, who can be reached at 925-279-6122 or [Sharon.Canas@VerizonWireless.com](mailto:Sharon.Canas@VerizonWireless.com). I look forward to working with you to develop an efficient and effective inter-carrier porting process between Verizon Wireless and Yorkville Telephone Cooperative.

Thank you for your immediate attention to our request.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie R. Petti".

Bonnie R. Petti  
Executive Director  
Network Operations Headquarters Staff

BP:sc

Enclosure



Verizon Wireless  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

November 18, 2003

**IMMEDIATE ATTENTION REQUESTED**

Yorkville Telephone Cooperative  
4 Newburn Highway  
Yorkville, TN 38389

Re: Local Number Portability

Dear Kerry Watson:

The FCC has recently reiterated the pre-existing deadlines for local number porting for wireless and wireline carriers operating outside the Top 100 MSAs, effective May 24, 2004. Verizon Wireless Cellco Partnership d/b/a Verizon Wireless would like to begin to complete a Service Level Agreement (SLA) to ensure a smooth transition to number portability by establishing procedures to govern the exchange of information during the porting process. Specifically, an SLA would serve several purposes: memorialize the intercarrier communications processes that the two carriers intend to follow, capture appropriate porting center and trouble contacts, and contain the parties' agreement to successfully facilitate porting customers. If you have not already received a copy of our SLA, you can obtain one by contacting Sharon Cañas at 925-279-6122 or email [Sharon.Canas@VerizonWireless.com](mailto:Sharon.Canas@VerizonWireless.com).

If negotiating an SLA is not possible in the next few weeks before the LNP deadline, Verizon Wireless's immediate concern is in obtaining, at minimum, a Trading Partner Profile (TPP). The TPP would provide basic factual information necessary to accomplish portability and would include those entities covered by the profile and any back-office or porting center contacts. Verizon Wireless plans to integrate this information into its information systems and also provide it to personnel staffing our porting center. Whether or not an SLA is ultimately executed, sharing this type of factual information is necessary to facilitate porting as well as fallout resolution. In this regard, we have enclosed a copy of the TPP with appropriate contact information.

Please include a response to this request along with a point of contact for provision of TPP information and/or SLA discussions in a letter or email addressed to the undersigned. Thank you for your immediate attention and cooperation.

A handwritten signature in cursive script, appearing to read "Linda Godfrey".

Linda Godfrey  
Member of Technical Staff  
Interconnection Numbering and Mandates  
Headquarters Network Operations Staff

Enclosure

- Copy sent to David Naeel/Pam Gist on 4-19-04
- faxed copy



Attn: Angie Green  
300 River Rock Blvd  
Murfreesboro, TN 37128

To whom it may concern,

Verizon Wireless is committed to ensuring the process for porting is a positive experience for customers. We would like to assist other carriers, our Trading Partners in porting, to understand key action items that they will need to take to effectively implement Local Number Portability (LNP) by May 24<sup>th</sup>, 2004. Taking the steps listed below should facilitate compliance with FCC rules and provide a smoother porting experience for our customers. We request that our Trading Partners take the following steps by May 24, 2004.

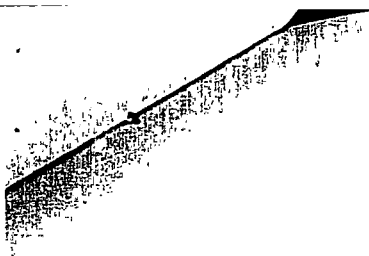
1. Complete a Verizon Wireless Trading Partner Profile (TPP). The Trading Partner Profile contains critical operational information such as SPID, porting hours of operation, and trouble contacts. You should have already received Verizon Wireless' TPP. However if you need a Verizon Wireless TPP, please contact Linda.Godfrey@VerizonWireless.com (925-279-6570).
2. Complete Testing. Testing is critical to a successful launch of number portability. We need to complete a minimum of five test transactions with you in each direction (i.e., a Port In and Port Out) prior to receiving a live customer request to port. Note that we will report to the FCC the progress of these testing efforts and our readiness to port on the May 24<sup>th</sup> date.

live in production

If you have questions on testing, please contact Marie.Moore@VerizonWireless.com (248-915-3430) if your company is wireline and Angelia.Green@VerizonWireless.com (615-372-2189) if your company is wireless.

In addition, you may want to participate in the industry sponsored testing committee which will assist you in understanding the testing process. All information for the Wireless Testing Subcommittee (WTSC) as well as other industry committees can be found on Neustar's website at [www.NPAC.com](http://www.NPAC.com) (click "wireless").

3. Review and understand the validation rules used by the wireless industry to verify a customer's identity before a port request can be honored.

- 
4. Open Codes. It is critical that you open your codes for porting in the LERG. This should occur at least 60 days in advance of the date customers will be porting. Failure to accomplish this important step will compromise the automated processes designed around LERG updates. If you have not opened your codes up for porting in the LERG yet, you should do so immediately.
  5. Review and understand the NANC Flows and the Wireless Inter-carrier Communications Interface Specification (WICIS) documents. The WICIS is for our wireless trading partners only. We can provide you with a copy of the NANC flows as part of our training packet which will be available to you. The WICIS document can be purchased via the OBF website ([www.atis.org](http://www.atis.org), click OBF under Committees) or the necessary information may be obtained via an automated vendor solution.

Again, we want to ensure that porting transactions with our trading partners are as efficient as possible for customers. We have a training package available to assist with your preparations to meet the May 24, 2004 deadline.

If you have any additional questions, please reach out to the Verizon Wireless contacts identified above.

Sincerely,

Verizon Wireless LNP Team